

# Exhibit B

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# Deposition Transcript of Wright

**In the Matter Of:**

*WRIGHT vs*

*DRIVERDO*

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*ISAAC WRIGHT*

*April 27, 2023*

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<p>1 UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF ILLINOIS</p> <p>3 EASTERN DIVISION</p> <p>4 ISSAC WRIGHT, Individually and on )</p> <p>5 Behalf of All Others Similarly )</p> <p>6 situated, )</p> <p>7 )</p> <p>8 Plaintiff, )</p> <p>9 )</p> <p>10 vs. ) No. 1:22-cv-4553</p> <p>11 )</p> <p>12 DRIVERDO, LLC, )</p> <p>13 )</p> <p>14 Defendant. )</p> <p>15</p> <p>16 The videotaped deposition of ISAAC WRIGHT,</p> <p>17 called by the Defendant for examination, taken pursuant</p> <p>18 to notice and pursuant to the Federal Rules of Civil</p> <p>19 Procedure for the United States District Courts</p> <p>20 pertaining to the taking of depositions, taken before</p> <p>21 Rocio Arias, Certified Shorthand Reporter, at 14136 Wood</p> <p>22 Street, Lot 2, Dixmore, Illinois, commencing at</p> <p>23 10:08 a.m. on the 27th day of April, A.D., 2023,</p> <p>24 appearing remotely via videoconference.</p>	<p>1 I N D E X</p> <p>2 WITNESS PAGE</p> <p>3 ISAAC WRIGHT</p> <p>4 Direct Examination by Benson ..... 5</p> <p>5</p> <p>6</p> <p>7 E X H I B I T S</p> <p>8 DEFENDANT'S EXHIBIT I.D. ADMITTED</p> <p>9 No. 1 (Complaint) ..... 24</p> <p>10 No. 2 (Plaintiff's Responses .... 43</p> <p>11 to Interrogatories)</p> <p>12</p> <p>13 NO. 4 (Text Messages from Tito) . 66</p> <p>14</p> <p>15 No. 6 (Communications) ..... 54</p> <p>16</p> <p>17 No. 8 (DRAIVER's Terms of 74</p> <p>18 Service)</p> <p>19 No. 11 (Text Messages from Tito) . 69</p> <p>20 No. 11 (1099s) ..... 74</p> <p>21 No. 12 (Spreadsheet) ..... 76</p> <p>22 No. 15 (Text Messages from Tito) . 66</p> <p>23 No. 16 (Text Messages from Tito) . 67</p> <p>24</p> <p>(EXHIBITS RETAINED BY MR. BENSON)</p>
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<p>1 APPEARANCES:</p> <p>2 SANFORD LAW FIRM, PLLC</p> <p>3 MR. COLBY QUALLS (via videoconference)</p> <p>4 10800 Financial Centre Parkway</p> <p>5 Suite 510</p> <p>6 Little Rock, Arkansas 72211</p> <p>7 Phone: (501) 221-0088</p> <p>8 E-mail: colby@sanfordlawfirm.com</p> <p>9 On behalf of the Plaintiff;</p> <p>10 O'HAGAN MEYER, LLC</p> <p>11 MR. RYAN T. BENSON (via videoconference)</p> <p>12 One East Wacker Drive</p> <p>13 Suite 3400</p> <p>14 Chicago, Illinois 60601</p> <p>15 Phone: (312) 422-6100</p> <p>16 E-mail: rbenson@ohaganmeyer.com</p> <p>17 On behalf of the Defendant.</p> <p>18 ALSO PRESENT: Mr. Pedro Diaz</p> <p>19 (videographer)</p> <p>20</p> <p>21 Ms. Kathy Zapp (via videoconference)</p> <p>22 Mr. Adam Friend (via videoconference)</p> <p>23</p> <p>24 * * * * *</p>	<p>1 THE VIDEOGRAPHER: We are now on the record.</p> <p>2 My name is Pedro Diaz. I am the videographer</p> <p>3 retained by Lexitas.</p> <p>4 This is the video deposition for the United</p> <p>5 States District Court, for the Northern District of</p> <p>6 Illinois, Eastern Division, Case Number 1:22-cv-4553.</p> <p>7 Today's date is April 27th, 2023. The time on</p> <p>8 the monitor is 10:08 a.m. Central Time.</p> <p>9 This deposition is being taken via Zoom Web</p> <p>10 conferencing where the deponent, counsel, and the court</p> <p>11 reporter are attending the deposition via an Internet</p> <p>12 connection from their separate locations in the matter of</p> <p>13 Isaac Wright versus Driverdo, LLC. The deponent is Isaac</p> <p>14 Wright. All counsel will be noted on the stenographic</p> <p>15 record.</p> <p>16 Will all counsel please identify themselves</p> <p>17 beginning with the questioning attorney?</p> <p>18 MR. BENSON: Hi. I'm Ryan Benson, and I represent</p> <p>19 Driverdo, LLC.</p> <p>20 MR. QUALLS: I'm Colby Qualls. I represent</p> <p>21 Mr. Wright.</p> <p>22 THE VIDEOGRAPHER: Thank you.</p> <p>23 The court reporter is Rocio Arias and will now</p> <p>24 swear in the witness after which then counsel can</p>

<p style="text-align: right;">Page 5</p> <p>1 proceed.</p> <p>2 (Witness sworn.)</p> <p>3 WHEREUPON:</p> <p>4 ISAAC WRIGHT,</p> <p>5 called as a witness herein, having been first duly sworn,</p> <p>6 was examined and testified as follows:</p> <p>7 MR. BENSON: So pursuant to the rules of Federal</p> <p>8 Procedure and by agreement of the parties this is the</p> <p>9 deposition of Plaintiff, Isaac Wright.</p> <p>10 DIRECT EXAMINATION</p> <p>11 BY MR. BENSON:</p> <p>12 Q. Can I call you Isaac today?</p> <p>13 A. Yes, sir.</p> <p>14 Q. I'm Ryan Benson. I'm the attorney for</p> <p>15 Driverdo, LLC.</p> <p>16 Have you ever had your deposition taken before?</p> <p>17 A. No, sir.</p> <p>18 Q. So just a little couple pointers and, I guess,</p> <p>19 ground rules.</p> <p>20 For depositions, you know, a lot of times</p> <p>21 you're going to probably know what I'm going to ask</p> <p>22 before I finish my question, but if you could, you know,</p> <p>23 wait until I finish my question before you answer, that</p> <p>24 would be appreciated or else I'm going to have to ask it</p>	<p style="text-align: right;">Page 7</p> <p>1 or ability to provide accurate answers?</p> <p>2 A. No, sir.</p> <p>3 Q. Awesome.</p> <p>4 Can you provide your full name and spelling of</p> <p>5 it, please, for the record?</p> <p>6 A. Yes. My name is Isaac, I S A A C; middle</p> <p>7 initial is T as in Travis; last name is Wright,</p> <p>8 W R I G H T.</p> <p>9 Q. And is your current address 1413 Wood Street,</p> <p>10 Lot 2, Dixmore, Illinois 60426?</p> <p>11 A. No, sir. Correction. It's 14136 Wood Street,</p> <p>12 Lot 2, Dixmore, Illinois 60426.</p> <p>13 Q. How long have you resided at this address?</p> <p>14 A. June 1st, 2019.</p> <p>15 Q. What's your highest level of education?</p> <p>16 A. High school diploma.</p> <p>17 Q. Have you received any work-related trainings or</p> <p>18 certifications?</p> <p>19 A. Could you rephrase the question because I don't</p> <p>20 understand it?</p> <p>21 Q. Have you received any types of work</p> <p>22 certifications, trainings?</p> <p>23 A. From?</p> <p>24 Q. From anywhere.</p>
<p style="text-align: right;">Page 6</p> <p>1 again, it'll probably just delay things.</p> <p>2 Also, if you could give verbal responses and</p> <p>3 not head nods and nodding your head side to side because</p> <p>4 we do have a court reporter, although we're on Zoom, she</p> <p>5 is writing everything down that's said.</p> <p>6 So if you give verbal responses, that'd be</p> <p>7 great. If you don't, I'll probably just -- I'll give you</p> <p>8 a -- I'll reask the question or ask you to give a verbal</p> <p>9 response.</p> <p>10 Sometimes I ask questions that I don't even</p> <p>11 understand at times during depositions, so please if you</p> <p>12 don't understand one of my questions, let me know.</p> <p>13 Is it fair if I ask a question and you heard</p> <p>14 and understood my question and you give an answer --</p> <p>15 Well, strike that.</p> <p>16 If you answer one of my questions, is it fair</p> <p>17 to assume that you understood it?</p> <p>18 A. Is it fair to assume that I understood it?</p> <p>19 Q. If I ask a question and you provide an answer.</p> <p>20 A. Yes, sir. If I provide an answer for it, that</p> <p>21 means that I understood it.</p> <p>22 Q. Great. Great.</p> <p>23 Is there -- Have you taken any medications</p> <p>24 today or consumed anything that would impair your memory</p>	<p style="text-align: right;">Page 8</p> <p>1 A. I'm prior military. That's the only thing I</p> <p>2 see you trying to reference to.</p> <p>3 Q. When were you in the military?</p> <p>4 A. I joined 1997.</p> <p>5 Q. When did you exit the military?</p> <p>6 A. 2008.</p> <p>7 Q. Were you employed in 2019?</p> <p>8 A. With DRAIVER? Yes.</p> <p>9 Q. Did you work anywhere else in 2019?</p> <p>10 A. No, sir.</p> <p>11 Q. Did you work anywhere in 2018?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Where?</p> <p>14 A. Uber.</p> <p>15 Q. Do you still work for Uber?</p> <p>16 A. No, sir.</p> <p>17 Q. When was the last time you performed an Uber</p> <p>18 trip?</p> <p>19 A. The day I started working for DRAIVER.</p> <p>20 Q. Why did you stop performing Uber trips?</p> <p>21 A. When did I do what, sir?</p> <p>22 Q. Why did you stop performing Uber trips?</p> <p>23 A. Because DRAIVER was sufficient.</p> <p>24 Q. What do you mean by "sufficient"?</p>

<p style="text-align: right;">Page 9</p> <p>1 A. DRAIVER was my only source of income for my</p> <p>2 home, and it did more -- it provided more than Uber did,</p> <p>3 so I put all my attention towards DRAIVER.</p> <p>4 <b>Q. Did you -- Did you do any trips on Lyft or any</b></p> <p>5 <b>other Ridesharing app?</b></p> <p>6 A. No, sir.</p> <p>7 <b>Q. How long did you drive for Uber?</b></p> <p>8 A. Since 2015.</p> <p>9 <b>Q. Isn't it true that you received a PPP loan?</b></p> <p>10 A. Correction. I didn't -- Rephrase that.</p> <p>11 <b>Q. Did you receive a Paycheck Protection Program</b></p> <p>12 <b>loan?</b></p> <p>13 A. Was I approved for it? Yes.</p> <p>14 <b>Q. Did you receive it?</b></p> <p>15 A. No, sir. It was cut out by the time they was</p> <p>16 able to give it to me?</p> <p>17 <b>Q. What business did you apply for under for a</b></p> <p>18 <b>personal -- or Payment Protection Program loan?</b></p> <p>19 A. What business?</p> <p>20 <b>Q. Yes.</b></p> <p>21 A. Uber.</p> <p>22 <b>Q. So you didn't -- you didn't apply under</b></p> <p>23 <b>Janitorial Services for the Payment Protection Payment</b></p> <p>24 <b>loan?</b></p>	<p style="text-align: right;">Page 11</p> <p>1 <b>Q. So were you -- What were you doing for Wright's</b></p> <p>2 <b>Services? Were you cleaning --</b></p> <p>3 A. Cleaning homes, finding apartments.</p> <p>4 Apartments, homes.</p> <p>5 <b>Q. When did you cease operating Wright's Cleaners</b></p> <p>6 <b>or cleaning homes?</b></p> <p>7 A. I started working for DRAIVER.</p> <p>8 <b>Q. So you drove for Uber starting in 2015; is that</b></p> <p>9 <b>correct?</b></p> <p>10 A. I believe so.</p> <p>11 <b>Q. Did you -- To start driving for Uber, did you</b></p> <p>12 <b>have to get trained in any way?</b></p> <p>13 A. No, sir.</p> <p>14 <b>Q. When you drove for Uber, were you driving your</b></p> <p>15 <b>own personal vehicle?</b></p> <p>16 A. Yes, sir.</p> <p>17 Well correction, I rented a vehicle from them.</p> <p>18 <b>Q. And on Uber what was your -- Strike that.</b></p> <p>19 <b>What type of vehicle did you rent from Uber?</b></p> <p>20 A. I don't remember at the time, but I know it was</p> <p>21 some type of electrical vehicle.</p> <p>22 <b>Q. Were you considered an independent contractor</b></p> <p>23 <b>when you worked for Uber?</b></p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 10</p> <p>1 A. Say that again, sir. What you mean Janitorial</p> <p>2 Service?</p> <p>3 <b>Q. My question is you didn't apply for Paycheck</b></p> <p>4 <b>Protection Program loan in regard to Janitorial Services;</b></p> <p>5 <b>is that correct?</b></p> <p>6 A. No, that was included too. It was Uber and</p> <p>7 Wright's Cleaners.</p> <p>8 COURT REPORTER: And Wright's what I'm sorry?</p> <p>9 THE WITNESS: Cleaners.</p> <p>10 BY MR. BENSON:</p> <p>11 <b>Q. What's Wright's Cleaners?</b></p> <p>12 A. It's a business I started when I was working</p> <p>13 with Uber. But it wasn't really a -- a business. I just</p> <p>14 took over clientele and gave myself a name. But then I</p> <p>15 had to get it certified.</p> <p>16 <b>Q. Is Wright's Cleaners still an operating</b></p> <p>17 <b>business?</b></p> <p>18 A. No, sir.</p> <p>19 <b>Q. Did Wright's Cleaners have any employees?</b></p> <p>20 A. Me and my wife.</p> <p>21 <b>Q. And when was Wright's Cleaners operating?</b></p> <p>22 A. I don't have the exact day -- I mean time. I</p> <p>23 don't know exactly. Like I said, it was during the time</p> <p>24 when I was driving for Uber.</p>	<p style="text-align: right;">Page 12</p> <p>1 <b>Q. Did Uber send you a 1099?</b></p> <p>2 A. Yes.</p> <p>3 <b>Q. Did Uber provide you a cell phone to perform</b></p> <p>4 <b>trips on their app?</b></p> <p>5 A. No, sir.</p> <p>6 <b>Q. Did DRAIVER provide you a cell phone to perform</b></p> <p>7 <b>trips on their app?</b></p> <p>8 A. No, sir.</p> <p>9 <b>Q. Did you have to sign any contracts to drive</b></p> <p>10 <b>with Uber?</b></p> <p>11 A. I believe so. Don't remember.</p> <p>12 <b>Q. Do you remember if you had agreed to Uber's</b></p> <p>13 <b>terms and conditions to --</b></p> <p>14 A. Yeah -- Yes.</p> <p>15 <b>Q. Let me finish my question, please.</b></p> <p>16 <b>Do you remember if you had agreed to Uber's</b></p> <p>17 <b>terms and conditions prior to accepting trips on the app?</b></p> <p>18 A. Yes.</p> <p>19 <b>Q. Did you have to agree to DRAIVER's terms and</b></p> <p>20 <b>conditions prior to accepting rides on the app?</b></p> <p>21 A. Yes.</p> <p>22 <b>Q. Prior to every ride taken with DRAIVER or every</b></p> <p>23 <b>trip accepted through the DRAIVER app, did you have to</b></p> <p>24 <b>agree to the terms and conditions?</b></p>

<p style="text-align: right;">Page 13</p> <p>1 A. No. All you have to do is accept the trip.</p> <p>2 There wasn't no terms to agree to.</p> <p>3 <b>Q. Do you remember if when you were accepting</b></p> <p>4 <b>trips, that it stated that you agreed to DRAIVER's terms</b></p> <p>5 <b>and conditions?</b></p> <p>6 A. When you accept the trip, it just has notes in</p> <p>7 there on talking about the trips. That's what I</p> <p>8 remember.</p> <p>9 <b>Q. Okay. Did you -- When driving for Uber, did</b></p> <p>10 <b>you have to accept a trip on the app to perform a trip?</b></p> <p>11 A. Yes.</p> <p>12 <b>Q. Before driving a trip on DRAIVER, a trip on the</b></p> <p>13 <b>DRAIVER app, did you have to accept a trip on the DRAIVER</b></p> <p>14 <b>app prior to performing the trip?</b></p> <p>15 A. Can you rephrase that question because it</p> <p>16 depends on who's giving out that trip?</p> <p>17 <b>Q. To perform a trip on the DRAIVER -- through the</b></p> <p>18 <b>DRAIVER app, did you have to accept a trip on the app?</b></p> <p>19 A. Yes.</p> <p>20 <b>Q. Sorry. One moment.</b></p> <p>21 <b>When you performed trips on the DRAIVER app,</b></p> <p>22 <b>did you own the car you were performing trips with?</b></p> <p>23 A. Yes.</p> <p>24 <b>Q. What type of car were you driving?</b></p>	<p style="text-align: right;">Page 15</p> <p>1 <b>the bank, your loan off directly; is that correct?</b></p> <p>2 A. That is correct.</p> <p>3 <b>Q. Why is your vehicle in your mother's name?</b></p> <p>4 A. Because she's helping me.</p> <p>5 <b>Q. Between 2019 and 2022, did you have car</b></p> <p>6 <b>insurance?</b></p> <p>7 A. Yes, sir, I did.</p> <p>8 <b>Q. What was your car insurance -- For who -- Who</b></p> <p>9 <b>is your car insurance through?</b></p> <p>10 A. It was through State Farm, then I went from</p> <p>11 State Farm to Geico.</p> <p>12 <b>Q. And DRAIVER never directly paid to State Farm</b></p> <p>13 <b>or Geico your car insurance; is that correct?</b></p> <p>14 A. No.</p> <p>15 <b>Q. Did DRAIVER buy you a cell phone?</b></p> <p>16 A. No.</p> <p>17 <b>Q. Did DRAIVER ever pay your cell phone bill?</b></p> <p>18 A. When you're axing this questions, because</p> <p>19 you're confusing me the question because you're saying</p> <p>20 did DRAIVER ever pay my phone bill. When I worked with</p> <p>21 the -- The money that I worked and got from them, yes,</p> <p>22 that's what paid my phone bill.</p> <p>23 <b>Q. But DRAIVER never directly paid to the phone</b></p> <p>24 <b>company your phone bill; is that correct?</b></p>
<p style="text-align: right;">Page 14</p> <p>1 A. 2018 Mitsubishi Eclipse Cross.</p> <p>2 <b>Q. Did you personally own that vehicle -- Or do</b></p> <p>3 <b>you personally own that vehicle, I should ask?</b></p> <p>4 A. Do I personally own it?</p> <p>5 <b>Q. Yes.</b></p> <p>6 A. Can you rephrase it? Is you trying to ax me is</p> <p>7 the vehicle in my name?</p> <p>8 <b>Q. Sure. Let's ask that. Is the 2018 Mitsubishi</b></p> <p>9 <b>Eclipse in your name?</b></p> <p>10 A. No, my mother's name. But I pay the notes.</p> <p>11 <b>Q. Is the car currently paid off?</b></p> <p>12 A. No, sir. Still trying to pay the notes on it.</p> <p>13 <b>Q. Did DRAIVER ever -- And when I'm talking</b></p> <p>14 <b>DRAIVER, I'm referring to the defendant Driverdo. Did</b></p> <p>15 <b>DRAIVER ever pay any of your monthly payments for the</b></p> <p>16 <b>vehicle?</b></p> <p>17 A. Can you rephrase? What do you mean pay my</p> <p>18 bills? Like they offered to pay my bills?</p> <p>19 <b>Q. Yeah. Did DRAIVER make any payments towards</b></p> <p>20 <b>your Mitsubishi Eclipse?</b></p> <p>21 A. Was they my only source of income? Yeah. Was</p> <p>22 I using they income to pay for my notes? Yes. If that's</p> <p>23 what you're trying to ax me.</p> <p>24 <b>Q. But DRAIVER never paid the car dealership or</b></p>	<p style="text-align: right;">Page 16</p> <p>1 A. That is correct, sir. Can you clear the</p> <p>2 questions up, please?</p> <p>3 <b>Q. Sure. I'll try my best, Mr. Wright.</b></p> <p>4 A. Thank you.</p> <p>5 <b>Q. Was your vehicle, your 2018 Mitsubishi Eclipse,</b></p> <p>6 <b>registered in the state of Illinois?</b></p> <p>7 A. Yes, sir, it is.</p> <p>8 <b>Q. Did DRAIVER ever pay to this -- to the best of</b></p> <p>9 <b>your knowledge your registration for your vehicle to the</b></p> <p>10 <b>State of Illinois?</b></p> <p>11 A. No, sir, they didn't.</p> <p>12 <b>Q. While you were performing trips on the DRAIVER</b></p> <p>13 <b>app, did you receive any traffic tickets?</b></p> <p>14 A. No, sir.</p> <p>15 <b>Q. Since 2019 have you filed taxes?</b></p> <p>16 A. Yes, sir.</p> <p>17 <b>Q. Have you filed taxes every year since 2019?</b></p> <p>18 A. Yes, sir.</p> <p>19 <b>Q. Did you stop accepting rides/trips on the</b></p> <p>20 <b>DRAIVER app in 2022?</b></p> <p>21 A. What do you mean stop?</p> <p>22 <b>Q. Did you stop doing trips?</b></p> <p>23 A. I don't remember.</p> <p>24 <b>Q. When was the last trip you accepted on the</b></p>

<p style="text-align: right;">Page 17</p> <p>1 <b>DRAIVER app?</b></p> <p>2 A. I do not remember. DRAIVER will have that</p> <p>3 information.</p> <p>4 <b>Q. So you could have never accepted a trip on the</b></p> <p>5 <b>DRAIVER app? You don't remember?</b></p> <p>6 A. I just said I don't remember. DRAIVER has that</p> <p>7 information.</p> <p>8 <b>Q. Did you accept a trip on the DRAIVER app in</b></p> <p>9 <b>2022?</b></p> <p>10 A. Again, DRAIVER has that information. I don't</p> <p>11 remember.</p> <p>12 <b>Q. So you don't know if you did any trips on the</b></p> <p>13 <b>DRAIVER app in 2022?</b></p> <p>14 A. Again, I don't remember. DRAIVER will have</p> <p>15 that information.</p> <p>16 <b>Q. So if you don't remember ever doing a</b></p> <p>17 <b>DRAIVER -- a trip on the DRAIVER app in 2022, you don't</b></p> <p>18 <b>know if you ever worked over 40 hours a week performing</b></p> <p>19 <b>DRAIVER trips in 2022; is that correct?</b></p> <p>20 A. I don't know if I what?</p> <p>21 <b>Q. If you don't remember performing a DRAIVER trip</b></p> <p>22 <b>in 2022, does that mean you also don't know if you ever</b></p> <p>23 <b>worked over 40 hours a week on DRAIVER trips in 2022?</b></p> <p>24 A. No, I know for a fact I worked over 40 hours.</p>	<p style="text-align: right;">Page 19</p> <p>1 A. Yes, I do still have it.</p> <p>2 <b>Q. Who's Shanika Wright?</b></p> <p>3 A. My wife.</p> <p>4 <b>Q. Since performing your last trip on the DRAIVER</b></p> <p>5 <b>app, have you worked for any other companies?</b></p> <p>6 A. No. Since I left DRAIVER, I no longer have a</p> <p>7 place to stay and I don't have a job because that was my</p> <p>8 only source of income.</p> <p>9 <b>Q. So you haven't had any source of income since</b></p> <p>10 <b>January or February of 2022?</b></p> <p>11 A. No, sir.</p> <p>12 <b>Q. Have you tried to drive for Uber again?</b></p> <p>13 A. No, sir.</p> <p>14 <b>Q. Why not?</b></p> <p>15 A. Because I have to go -- There's a lot of stuff</p> <p>16 I have to go back and do to be recertified, and I don't</p> <p>17 have the funds to do it.</p> <p>18 <b>Q. Are you currently receiving any State benefits</b></p> <p>19 <b>or Federal benefits?</b></p> <p>20 A. No, sir.</p> <p>21 <b>Q. How did you hear of DRAIVER?</b></p> <p>22 A. I believe I saw it on Indeed or one of them</p> <p>23 popular work sites.</p> <p>24 <b>Q. When you said a moment ago you have to get</b></p>
<p style="text-align: right;">Page 18</p> <p>1 <b>Q. And when was that?</b></p> <p>2 A. Any week I worked with DRAIVER.</p> <p>3 <b>Q. But you don't know --</b></p> <p>4 A. And I'm axing you -- I'm axing you to clear the</p> <p>5 questions up. You axing me did I ever -- my last time</p> <p>6 that I worked with DRAIVER in 2022. I don't remember</p> <p>7 that. Now you're axing me did I -- do I know for sure</p> <p>8 about any 40 hours in '22. If I'm axing -- If I'm</p> <p>9 telling you I don't remember working at DRAIVER, you keep</p> <p>10 axing me the same question, but you're trying to rephrase</p> <p>11 it and put it in a way to try to make me seem like I'm a</p> <p>12 liar. So again, can you make the questions more clear?</p> <p>13 <b>Q. Do you remember working for DRAIVER in 2022?</b></p> <p>14 A. I don't remember.</p> <p>15 <b>Q. Do you remember working for DRAIVER in 2021?</b></p> <p>16 A. Yes, sir.</p> <p>17 <b>Q. But in 2022 you don't have recollection of any</b></p> <p>18 <b>trips that you performed for DRAIVER; is that correct?</b></p> <p>19 A. I remember '21. I don't remember '22. I mean,</p> <p>20 man. I believe -- not for sure, but I believe the last</p> <p>21 trip I took was in February or January of 2022. I</p> <p>22 believe.</p> <p>23 <b>Q. Do you currently have on your phone the DRAIVER</b></p> <p>24 <b>app?</b></p>	<p style="text-align: right;">Page 20</p> <p>1 certifi- -- you had to get certifications to re-drive for</p> <p>2 <b>Uber, what certifications were you referring to?</b></p> <p>3 A. Well, you have to take your vehicle back down</p> <p>4 there to be re-inspected in order for them to drive it.</p> <p>5 And my check engine light is on, so I can't go down</p> <p>6 there.</p> <p>7 <b>Q. Did DRAIVER inspect your 2018 Mitsubishi</b></p> <p>8 <b>Eclipse prior to you using it in any trips through the</b></p> <p>9 <b>app?</b></p> <p>10 A. No, sir. You just have to have insurance.</p> <p>11 <b>Q. How are you currently paying your expenses</b></p> <p>12 <b>without any income?</b></p> <p>13 A. My wife is working.</p> <p>14 <b>Q. What's her job?</b></p> <p>15 A. And we can't pay nothing because we live on the</p> <p>16 streets, and she work at Dollar Tree.</p> <p>17 <b>Q. Is it true that you live on the streets, or do</b></p> <p>18 <b>you actually live at 14136 Wood Street?</b></p> <p>19 A. No, it's true that I live on the streets.</p> <p>20 <b>Q. Was the address 14136 Wood Street, Lot 2,</b></p> <p>21 <b>Dixmore, Illinois, was that place foreclosed on?</b></p> <p>22 A. No, sir. I wasn't able to pay rent because of</p> <p>23 the loss. When I lost my job with DRAIVER, I wasn't able</p> <p>24 to pay rent, so we was kicked out of our homes.</p>



<p style="text-align: right;">Page 21</p> <p>1 <b>Q. Where do you currently receive your mail?</b></p> <p>2 A. Goes to her mother house.</p> <p>3 <b>Q. What's that address?</b></p> <p>4 A. Harvey, Illinois.</p> <p>5 <b>Q. What address in Harvey?</b></p> <p>6 A. 15927 Paulina Street.</p> <p>7 <b>Q. Did you have to apply to start doing trips</b></p> <p>8 <b>through DRAIVER.</b></p> <p>9 A. What do you mean? Apply for DRAIVER to get</p> <p>10 on -- put on an app?</p> <p>11 <b>Q. Yes.</b></p> <p>12 A. Yes, sir. That's with any job, you have to</p> <p>13 apply.</p> <p>14 <b>Q. And what was that process? What did that</b></p> <p>15 <b>process entail?</b></p> <p>16 A. Don't remember.</p> <p>17 <b>Q. During that process, did you speak to anybody</b></p> <p>18 <b>on the telephone?</b></p> <p>19 A. Don't remember that either. I probably did,</p> <p>20 but I don't remember.</p> <p>21 <b>Q. When I use the term chaser, does that mean</b></p> <p>22 <b>anything to you?</b></p> <p>23 A. That's what DRAIVER called the individual that</p> <p>24 picks up the hikers and take them to they destination.</p>	<p style="text-align: right;">Page 23</p> <p>1 A. Yes.</p> <p>2 <b>Q. What type of details could you learn about a</b></p> <p>3 <b>trip before you accepted it?</b></p> <p>4 A. In the details it just tell you what time they</p> <p>5 would like you to start, and any other notes that they</p> <p>6 felt like they should put in there. Anything that they</p> <p>7 can find that they can make up to put in there, they put</p> <p>8 in there. If something that they feel wasn't right, then</p> <p>9 they'll make that a rule and put it in the notes.</p> <p>10 <b>Q. In the notes would there be such things as what</b></p> <p>11 <b>type of vehicles are being picked up or the locations</b></p> <p>12 <b>that you'd have to pick up individuals?</b></p> <p>13 A. Sometimes they had the vehicles in there,</p> <p>14 sometimes they don't.</p> <p>15 <b>Q. When you're performing chaser trips, did you</b></p> <p>16 <b>have to pay for your own gas?</b></p> <p>17 A. Yes, sir.</p> <p>18 <b>Q. When accepting a pacer -- a chaser trip, would</b></p> <p>19 <b>it tell you how many passengers you were going to pick</b></p> <p>20 <b>up?</b></p> <p>21 A. Yeah, I would say. I have to fit three or two</p> <p>22 in there comfortably.</p> <p>23 <b>Q. Were you performing chaser trips to the same</b></p> <p>24 <b>start and drop off locations regularly, or were they --</b></p>
<p style="text-align: right;">Page 22</p> <p>1 COURT REPORTER: I'm sorry. That picks up what, and</p> <p>2 takes them to their destination?</p> <p>3 THE WITNESS: A chaser is a individual that DRAIVER</p> <p>4 uses to pick up hikers to take them to --</p> <p>5 COURT REPORTER: Thank you.</p> <p>6 THE WITNESS: -- their destination.</p> <p>7 COURT REPORTER: Thank you.</p> <p>8 BY MR. BENSON:</p> <p>9 <b>Q. When using the app, did you perform more chaser</b></p> <p>10 <b>or driver duties?</b></p> <p>11 A. Chaser.</p> <p>12 <b>Q. When accepting trips on the app, did you</b></p> <p>13 <b>primarily -- Strike that.</b></p> <p>14 <b>When accepting trips on the app, did you almost</b></p> <p>15 <b>always do -- act as a chaser?</b></p> <p>16 A. Sometimes. Yeah, almost. Almost all the time.</p> <p>17 Almost all the time.</p> <p>18 <b>Q. Why did you accept more chaser jobs than driver</b></p> <p>19 <b>jobs?</b></p> <p>20 A. Pay more.</p> <p>21 <b>Q. Prior to accepting a trip on the app, would it</b></p> <p>22 <b>tell you how much the trip was going to pay you?</b></p> <p>23 A. Yes.</p> <p>24 <b>Q. Would it also tell you the details of the trip?</b></p>	<p style="text-align: right;">Page 24</p> <p>1 <b>the trips you accepted all different?</b></p> <p>2 A. Some was regular, some was different. It</p> <p>3 depends on the area manager.</p> <p>4 <b>Q. All right. I am going to mark my first</b></p> <p>5 <b>exhibit.</b></p> <p>6 <b>Mr. Wright, can you see that -- can you see on</b></p> <p>7 <b>your phone? Does it say Exhibit 1?</b></p> <p>8 A. (No verbal response.)</p> <p>9 MR. BENSON: Did we lose him?</p> <p>10 THE VIDEOGRAPHER: I think he froze. Can we go --</p> <p>11 can we take a brief break?</p> <p>12 MR. BENSON: Yeah.</p> <p>13 THE VIDEOGRAPHER: Wait. Wait. There he is.</p> <p>14 Mr. Wright, can you hear us?</p> <p>15 THE WITNESS: Perfectly.</p> <p>16 BY MR. BENSON:</p> <p>17 <b>Q. Mr. Wright, can you see on the -- your screen</b></p> <p>18 <b>Exhibit 1?</b></p> <p>19 A. Yes, sir.</p> <p>20 <b>Q. All right. I'm going to show you an exhibit.</b></p> <p>21 <b>I'm going to show you -- I'm going to be showing you</b></p> <p>22 <b>exhibits throughout this deposition, okay? I'm going to</b></p> <p>23 <b>slowly scroll through. I'm going to ask you if you know</b></p> <p>24 <b>what this document is, okay? So I'm going to slowly</b></p>



<p style="text-align: right;">Page 25</p> <p>1 scroll through this real quick. If you need me to stop,  2 just tell me to stop.  3 A. You're asking me what it is?  4 Q. Yeah. Do you know what this document is?  5 I'm at the end. After me showing you this  6 document, do you know what it is?  7 A. Can you say it one more time? Repeat it again.  8 Q. Do you know what this document is? Do you  9 recognize this document?  10 A. Yes, sir. It is my case file.  11 Q. Is this the complaint that you filed in the  12 case?  13 A. Yes.  14 Q. Is this your signature right here?  15 A. Yes, it is.  16 Q. Did you review this document before it was  17 filed?  18 A. Yes, I did.  19 Q. And you agree with every statement made in this  20 document?  21 A. Yes, if I made it.  22 Q. In Paragraph 36 it says, Plaintiff and other  23 drivers were required to complete the task defendant  24 assigned to them or risk being disciplined, including</p>	<p style="text-align: right;">Page 27</p> <p>1 Q. So did you accept every single trip that was  2 listed on the app?  3 A. No, sir. Depends on the area manager.  4 Q. So is your answer you did not accept all trips  5 that were listed on the app?  6 A. It is humanly impossible to accept every trip  7 on the app.  8 Q. So is your answer no?  9 A. Yes, sir.  10 Q. Were you ever required to accept a trip on the  11 app?  12 A. Yes.  13 Q. In what way?  14 A. If DRAIVER had a trip up there and then they  15 needed 11 drivers, they would not -- Let's say I didn't  16 want to take that, wouldn't be no choice because they  17 would not put no other trip up there or do anything else  18 until that trip is filled.  19 Q. But you had a choice to accept or decline that  20 trip; is that correct?  21 A. Yeah, if I want to make some money, sir.  22 Q. So you could -- So no one forced you to accept  23 a trip that was on the app; is that correct?  24 A. Rephrase the question again because --</p>
<p style="text-align: right;">Page 26</p> <p>1 termination. Am I reading that correct?  2 A. Yes, you are.  3 Q. Isn't it true that you accepted the trips on  4 the app before performing them?  5 A. Yes.  6 Q. Isn't it true that no one from DRAIVER ever  7 accepted a trip on the app for you?  8 A. Rephrase that. What do you mean by accepted a  9 trip?  10 Q. Did anybody that was -- Did anybody besides  11 yourself accept trips that you performed on the DRAIVER  12 app?  13 A. Are you trying to ax me did they send me trips  14 without me accepting them?  15 Q. No. Did DRAIVER ever have trips on the app  16 that you did not accept?  17 A. That I did not accept?  18 Q. Yes.  19 A. I don't think there's not one trip that I did  20 not accept.  21 Q. Wasn't there -- At times, weren't there  22 multiple trips listed on the app?  23 A. At times, you absolutely right, there are  24 multiple trips listed on the app.</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Did anybody force you to accept a trip that was  2 on the app?  3 A. To me? Forcing me to take a trip because you  4 need the trip filled, yeah, that's forcing because I have  5 to take this trip in order for you to put some more trips  6 up there. Yeah, that's a force to me.  7 Q. But you were never told, You need to accept  8 this trip; is that correct?  9 A. I was told that the trip has to be filled for  10 any other trips to come on that board. I don't know how  11 you're trying to rephrase this question, but I'm going to  12 answer the same way you keep rephrasing it. It's the  13 same answer. Ain't nothing going to change.  14 Q. But no one told you you needed to accept a  15 trip; is that correct?  16 A. No one told me that I needed to accept the  17 trip, no.  18 Q. So every trip that you accepted was on your own  19 free will; is that correct?  20 A. Again, I cannot say that because when they put  21 the trips up there, things have to go they way before  22 another trip to be put up there. So again, that question  23 is -- is going to be the same way.  24 Q. When there were multiple trips listed on the</p>

<p style="text-align: right;">Page 29</p> <p>1 app, were you ever forced to take one trip over a</p> <p>2 different one?</p> <p>3 A. Again, when there was multiple trips on there,</p> <p>4 if I pick the trip and an area manager did not want me on</p> <p>5 that trip, yes, he took that trip from me. So again you</p> <p>6 need to rephrase that question. Because, yes, there is</p> <p>7 multiple trips on that app.</p> <p>8 Q. When you did not accept a trip, did you receive</p> <p>9 other trip opportunities in the future?</p> <p>10 A. Again, depending on the area manager.</p> <p>11 Q. Is the answer yes or no?</p> <p>12 A. I cannot answer that with a complete yes or no</p> <p>13 answer when I'm telling you it depended on the area</p> <p>14 manager. I can't say yes or no to that question.</p> <p>15 Q. My question's pretty simple. If you did not</p> <p>16 accept a --</p> <p>17 A. And my answer is pretty simple too, sir.</p> <p>18 Q. If you did not accept a trip on the app, could</p> <p>19 you accept a future trip that was posted on the app, yes</p> <p>20 or no?</p> <p>21 A. Yes. Depends on the area manager. You keep</p> <p>22 putting these questions, and I'm going to keep giving you</p> <p>23 the same answers, sir. Ain't nothing going to change on</p> <p>24 my answer. Did they have say-so over our trips? Yes,</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. Do you know if there were different trips</p> <p>2 posted to different contractors' apps?</p> <p>3 A. Yes, I know that for a fact.</p> <p>4 Q. How do you know that?</p> <p>5 A. Because the driver would show me.</p> <p>6 Q. What driver showed you?</p> <p>7 A. They number one guy, Jesus. I don't know his</p> <p>8 last name.</p> <p>9 Q. Is that the only person that showed you?</p> <p>10 A. I can name a couple more people, but I don't</p> <p>11 know they name. It's more like people that's been there</p> <p>12 like Michelle. What was that other guy's name?</p> <p>13 Michelle -- It's a lot of them. Oh, my goodness. That's</p> <p>14 why I got my phone here. There was a few of them. Can't</p> <p>15 think of they names off top, but those are a couple of</p> <p>16 names that I could think of off top, Jesus and Michelle.</p> <p>17 Q. How would they show you there's different trips</p> <p>18 around?</p> <p>19 A. Because when we are in the truck and a trip</p> <p>20 pops up, it pops up on theirs and never pops up on mine.</p> <p>21 And they tells me out of they mouth that the area manager</p> <p>22 sent to them -- to them personally, or it's only</p> <p>23 dedicated to -- they only delegate certain trips to</p> <p>24 certain people -- to certain drivers of the company.</p>
<p style="text-align: right;">Page 30</p> <p>1 they did, sir.</p> <p>2 Q. Were there certain trips you routi -- routinely</p> <p>3 did not accept because you did not want to drive that</p> <p>4 trip?</p> <p>5 A. There was trips that I could not get because</p> <p>6 the area manager didn't display likeness for me.</p> <p>7 Q. I'm going to ask again because you didn't</p> <p>8 answer the question. Were there certain trips you</p> <p>9 routinely did not accept because you did not want to</p> <p>10 drive that trip?</p> <p>11 A. No. There was no trip that I did not -- that I</p> <p>12 accepted that I did not want to do.</p> <p>13 Q. Were there trips that you did accept, but you</p> <p>14 did not want to do them?</p> <p>15 A. Yes, because I needed to make some money.</p> <p>16 Q. But if you didn't accept a trip, you wouldn't</p> <p>17 get paid; is that correct?</p> <p>18 A. I wouldn't make no money. You right. I</p> <p>19 wouldn't make no money. You right about that, sir.</p> <p>20 Q. Were there driver trips that were posted on the</p> <p>21 app that you did not accept?</p> <p>22 A. May have, may have not. Don't remember.</p> <p>23 Because if you put a certain -- on your app, then those</p> <p>24 the trips that comes to you. So again, may or may not.</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Did you ever ask anyone working at DRAIVER for</p> <p>2 certain trips?</p> <p>3 A. What do you mean ax?</p> <p>4 Q. Did you ask them for certain trips that you'd</p> <p>5 like to perform?</p> <p>6 A. Did I ax anyone at DRAIVER? Did I have a</p> <p>7 relationship with Tito and Alex where I can call them and</p> <p>8 ax to see if they have trips? Yes.</p> <p>9 Q. And would they ever send certain trips directly</p> <p>10 to you once you asked them?</p> <p>11 A. Sometimes. Sometimes they wouldn't.</p> <p>12 Q. DRAIVER never told you that you had to work a</p> <p>13 certain amount of hours a week; is that correct?</p> <p>14 A. No.</p> <p>15 MR. BENSON: All right. I got to go to the</p> <p>16 bathroom. I need a little break.</p> <p>17 Colby, 10 minutes?</p> <p>18 MR. QUALLS: 10 minutes works.</p> <p>19 MR. BENSON: 11:18?</p> <p>20 MR. QUALLS: It sounds good.</p> <p>21 MR. BENSON: Okay.</p> <p>22 THE VIDEOGRAPHER: We're going to go off the video</p> <p>23 record. The time is 11:08 a.m. Central Time.</p> <p>24 (A short break was had.)</p>

<p style="text-align: right;">Page 33</p> <p>1 THE VIDEOGRAPHER: This is the start of Media Label</p> <p>2 No. 2. Going back on the video record, and the time is</p> <p>3 11:20 a.m. Central Time.</p> <p>4 BY MR. BENSON:</p> <p>5 Q. I'm looking at Exhibit 1, the complaint, again.</p> <p>6 And, Mr. Wright, it says in Paragraph 36, let me know if</p> <p>7 I'm misreading that. Plaintiff and other drivers were</p> <p>8 required to complete the tasks defendant assigned to them</p> <p>9 or risk being disciplined, including termination. Is</p> <p>10 that correct?</p> <p>11 A. Yeah. But I don't see that thing up there no</p> <p>12 more.</p> <p>13 Q. You don't see the complaint on the screen</p> <p>14 anymore?</p> <p>15 A. No, sir. Now I do.</p> <p>16 Now you say what now?</p> <p>17 Q. Plaintiff and other drivers were required to</p> <p>18 complete the tasks defendant assigned to them or risk</p> <p>19 being disciplined, including termination. Am I reading</p> <p>20 that correct?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Isn't it true that you were never assigned a</p> <p>23 trip but accepted a trip yourself?</p> <p>24 A. No, that's not true.</p>	<p style="text-align: right;">Page 35</p> <p>1 continuously?</p> <p>2 A. Yeah. I mean yeah. As long as you're active</p> <p>3 on the portal, yeah, you can accept trips.</p> <p>4 Q. Paragraph 42 you state, Plaintiff and other</p> <p>5 drivers regularly and customarily worked at defendant's</p> <p>6 facility. Am I reading that correct?</p> <p>7 A. Plaintiff and other drivers regularly and -- At</p> <p>8 the defendant's facility?</p> <p>9 Q. Yes.</p> <p>10 A. No. What do you mean regularly? I don't</p> <p>11 understand that.</p> <p>12 Q. Sir, you're the one that filed the complaint,</p> <p>13 but do you know -- do you understand what plaintiff</p> <p>14 means?</p> <p>15 A. Yeah. I know what -- I know what the plaintiff</p> <p>16 means.</p> <p>17 Q. Who's the plaintiff in this case?</p> <p>18 A. Me.</p> <p>19 Q. Did you ever work at any of defendant's</p> <p>20 facilities?</p> <p>21 A. Work at they facility? They don't have a</p> <p>22 facility. What do you mean? So did we work at a</p> <p>23 designated place? Yes.</p> <p>24 Q. But it wasn't owned by DRAIVER or Driverdo,</p>
<p style="text-align: right;">Page 34</p> <p>1 Q. How were you ever assigned a trip?</p> <p>2 A. Tito sent me trips. Alex sent me trips.</p> <p>3 Timothy Casey, when he was there, sent me trips. What is</p> <p>4 the other area manager name? I can't think of his name.</p> <p>5 But yeah, they done sent me trips before.</p> <p>6 Q. But you weren't required to accept them; is</p> <p>7 that correct?</p> <p>8 A. No.</p> <p>9 Q. So are you saying you were required to accept</p> <p>10 the trips?</p> <p>11 A. No, we wasn't required to accept a trip is what</p> <p>12 I'm telling you.</p> <p>13 Q. Okay. It states here in Paragraph 39.</p> <p>14 Plaintiff and other drivers were hired to work for</p> <p>15 defendant for continuous and ongoing period of time. Am</p> <p>16 I reading that correct?</p> <p>17 A. Mm-hmm -- Yes, sir.</p> <p>18 Q. What do you mean by you were hired to work for</p> <p>19 a continuous and ongoing period of time?</p> <p>20 A. This was no seasonal job. Wasn't no limit on</p> <p>21 there. This was actually a job, job. It wasn't no peak</p> <p>22 season or nothing like that. It was a job.</p> <p>23 Q. So you're saying you could have -- During your</p> <p>24 time accepting trips, you could accept the trip</p>	<p style="text-align: right;">Page 36</p> <p>1 correct?</p> <p>2 A. No, it was contacted through them, yeah. It</p> <p>3 wasn't owned by them, but it was contracted with them.</p> <p>4 Q. What facility did DRAIVER or Driverdo contract?</p> <p>5 A. Pensy -- Penske, Budget. So that was our</p> <p>6 meeting place.</p> <p>7 Q. But you have no knowledge that you ever stepped</p> <p>8 foot on any property owned by DRAIVER or Driverdo; is</p> <p>9 that correct?</p> <p>10 A. Rephrase that because I stepped on one of they</p> <p>11 area manager's property before to pick up -- What was I</p> <p>12 picking up? Pick up some keys.</p> <p>13 Q. Where did you -- Where did you pick up keys</p> <p>14 from an area manager?</p> <p>15 A. What's that man name? Tito's. He left it on</p> <p>16 the porch.</p> <p>17 Q. Was it the porch of his house?</p> <p>18 A. Yes.</p> <p>19 Q. So --</p> <p>20 A. And if I'm not mistaken, that's where he worked</p> <p>21 from.</p> <p>22 Q. So between 2019 and 2022 the only time you</p> <p>23 believe you -- Strike that. Let me rephrase.</p> <p>24 Did you ever enter any type of office building</p>

<p style="text-align: right;">Page 37</p> <p>1 of DRAIVER or Driverdo?</p> <p>2 A. Any office building? No. Because the office</p> <p>3 is --</p> <p>4 Q. It's okay if you say no. No is fine.</p> <p>5 Did you ever meet in person any area manager?</p> <p>6 A. No.</p> <p>7 Q. Did you ever have an area manager ride in your</p> <p>8 vehicle?</p> <p>9 A. There was no area manager, but he called</p> <p>10 himself a manager.</p> <p>11 Q. Who are you referring to?</p> <p>12 A. I can't think. Give me a few minutes. That's</p> <p>13 what he told us. I can't think of his name. I can't</p> <p>14 think of his name. Sammy.</p> <p>15 Q. Who's Sammy?</p> <p>16 A. He said he was basically a field manager.</p> <p>17 That's what he called himself.</p> <p>18 Q. When did you meet him?</p> <p>19 A. I meet him when I was working for DRAIVER.</p> <p>20 What do you mean?</p> <p>21 Q. Was there a certain date that you met him? Was</p> <p>22 there a certain shift that you met him?</p> <p>23 A. I don't remember, but it was -- he had been in</p> <p>24 my vehicle plenty of times.</p>	<p style="text-align: right;">Page 39</p> <p>1 Q. So sometimes they gave you more when you asked</p> <p>2 for it?</p> <p>3 A. Yes, sometimes.</p> <p>4 Q. Okay.</p> <p>5 A. Because that's when I have to wait four and</p> <p>6 five extra hours.</p> <p>7 Q. Do you know if other chasers or drivers ever</p> <p>8 asked for more money to complete trips and they received</p> <p>9 it or not?</p> <p>10 A. That's where I learned to ax for money from,</p> <p>11 was the other drivers.</p> <p>12 Q. So they told you at times when they asked for</p> <p>13 more money to complete trips that happened?</p> <p>14 A. Yeah. I axed for more money on the wait time.</p> <p>15 That's the only time I axed for more money. Because if I</p> <p>16 have to wait an extra five hours, yeah. And they only</p> <p>17 give you \$20 for that.</p> <p>18 Q. When you accepted a trip on the app, was there</p> <p>19 start times for the trips?</p> <p>20 A. Yes, sir, it was -- They prefer start times.</p> <p>21 Q. But at times you could -- Or at times drivers</p> <p>22 and chasers would start before the start time listed on</p> <p>23 the app; is that correct?</p> <p>24 A. Yeah. But there were repercussions behind</p>
<p style="text-align: right;">Page 38</p> <p>1 Q. Do you remember any conversations you had with</p> <p>2 him?</p> <p>3 A. Some.</p> <p>4 Q. What conversations did you have with him?</p> <p>5 A. Just talking about the trips. He gave me</p> <p>6 insight on the trips and what I need to do. And that's</p> <p>7 pretty much how I found out that area manager are picky</p> <p>8 on who they want to give the trips to.</p> <p>9 Q. Paragraph 44, it says, Defendant set prices --</p> <p>10 sorry -- Defendant set prices for services without input</p> <p>11 from or negotiation with plaintiff and other drivers. Am</p> <p>12 I reading that correct?</p> <p>13 A. Yes.</p> <p>14 Q. Isn't it true that at times you asked for more</p> <p>15 money to complete a trip?</p> <p>16 A. Is it true that I axed for more money? Yes, I</p> <p>17 did. Did I receive it? No, I didn't.</p> <p>18 Q. So when you asked for more money --</p> <p>19 A. Let me rephrase that. Sometimes. Just in</p> <p>20 case. Sometimes.</p> <p>21 Q. So sometimes you would ask for more money, and</p> <p>22 you received it?</p> <p>23 A. No. Sometimes they gave it to me. That's what</p> <p>24 I meant by sometimes.</p>	<p style="text-align: right;">Page 40</p> <p>1 that.</p> <p>2 Q. But at times drivers and chasers -- I'll call</p> <p>3 them users -- started before start times on the app, is</p> <p>4 that true?</p> <p>5 A. Yes. But there was repercussions behind it,</p> <p>6 sir.</p> <p>7 Q. What do you mean by repercussions?</p> <p>8 A. Because if the trip started at 9:00 o'clock and</p> <p>9 we start a little bit early from there and we go down</p> <p>10 there and the truck is not there, we have to wait until</p> <p>11 they physically get up out they bed and answer the phone.</p> <p>12 Other than that we'll be waiting for hours until they</p> <p>13 feel like they want to answer our call and let us know</p> <p>14 what to do because of the --</p> <p>15 Q. And who are you calling? Are you calling</p> <p>16 DRAIVER are Driverdo's customer service?</p> <p>17 A. I was calling the customer service at first,</p> <p>18 but all they do is escalate the call to the area manager.</p> <p>19 And then when the area manager called, I just kept the</p> <p>20 number. And that's who I talk to.</p> <p>21 Q. So over the time you learned the area manager's</p> <p>22 numbers; is that correct?</p> <p>23 A. (No verbal response.)</p> <p>24 MR. BENSON: I think he's frozen.</p>

<p style="text-align: right;">Page 41</p> <p>1 Can you hear me?</p> <p>2 A. Yes, sir.</p> <p>3 MR. BENSON: Rocio, can you read back my last</p> <p>4 question? I don't remember what I asked. Impossible.</p> <p>5 (Record read as requested.)</p> <p>6 BY THE WITNESS:</p> <p>7 A. And I replied yes.</p> <p>8 <b>Q. You would predominately contact area managers</b></p> <p>9 <b>when there was a problem with the trip; is that right?</b></p> <p>10 A. Yes. Sometimes, and sometimes no. Customer</p> <p>11 service, whatever you call them people.</p> <p>12 <b>Q. What other reasons would you contact the area</b></p> <p>13 <b>manager besides having an issues with the trip?</b></p> <p>14 A. That's the only time you would call the area</p> <p>15 manager, if you're having an issue with the trip or</p> <p>16 you're trying to get a trip.</p> <p>17 <b>Q. When would the area managers reach out to you?</b></p> <p>18 A. Whenever they felt like it.</p> <p>19 <b>Q. Would they only reach out about issues with</b></p> <p>20 <b>trips and/or see if you'd accept a trip?</b></p> <p>21 A. Pretty much. Issues with the trip, or seeing</p> <p>22 if I'd accept a trip, you're right.</p> <p>23 <b>Q. When you accepted a trip, were you required to</b></p> <p>24 <b>take a certain rout -- route performing the trip?</b></p>	<p style="text-align: right;">Page 43</p> <p>1 were giving the answer.</p> <p>2 A. Oh, wow.</p> <p>3 <b>Q. So I got to ask it again.</b></p> <p>4 A. Sure.</p> <p>5 <b>Q. When were you told you were to go a certain</b></p> <p>6 <b>way?</b></p> <p>7 A. If we got to a location and the location that I</p> <p>8 used on my map didn't show the right location of where</p> <p>9 the truck need to be picked up at and then we had to call</p> <p>10 them, and he would tell me that I should of went this</p> <p>11 way, and I'm telling him that I'm only going the way that</p> <p>12 my maps tell me to go.</p> <p>13 <b>Q. So you're just talking about the end location,</b></p> <p>14 <b>is where you're being told to go to?</b></p> <p>15 A. Yeah. Pretty much. Yes, sir.</p> <p>16 <b>Q. But you were never told besides not taking toll</b></p> <p>17 <b>roads how to get to the end location; is that correct?</b></p> <p>18 A. No, sir.</p> <p>19 <b>Q. All right. I'm going to mark this as</b></p> <p>20 <b>Exhibit 2 called Plaintiff's Responses to</b></p> <p>21 <b>Interrogatories. That's what I'm looking at.</b></p> <p>22 <b>I'm going to scan through this again,</b></p> <p>23 <b>Mr. Wright, real quick so you can see, and then I'm going</b></p> <p>24 <b>to ask you about specific responses.</b></p>
<p style="text-align: right;">Page 42</p> <p>1 A. No at first.</p> <p>2 <b>Q. What do you mean "no at first"? Can you expand</b></p> <p>3 <b>on that?</b></p> <p>4 A. Because when I would take a trip, I normally go</p> <p>5 through the toll road, and they normally 'posed to pay</p> <p>6 for tolls. But because my tolls were so high, they</p> <p>7 didn't want to pay for that. They telling me that I need</p> <p>8 to stop taking the tollway so much. And this came out of</p> <p>9 Tito's mouth.</p> <p>10 <b>Q. So they told you to -- they didn't want to</b></p> <p>11 <b>reimburse you for tolls?</b></p> <p>12 A. Stop taking the toll so much. Yes, sir.</p> <p>13 <b>Q. So besides taking the toll road and reimbursing</b></p> <p>14 <b>you for tolls, did they ever direct you on exact roads to</b></p> <p>15 <b>take to certain destinations?</b></p> <p>16 A. Sometimes. If they wanted us to go a certain</p> <p>17 way.</p> <p>18 <b>Q. When did they ask you to go a certain way?</b></p> <p>19 A. When I had to call them to get the right</p> <p>20 destination. So he telling me that I should have went</p> <p>21 this way when my only thing I'm doing is following my GPS</p> <p>22 map. So yeah, there's plenty of times he gonna say that</p> <p>23 to me.</p> <p>24 <b>Q. You were frozen the entire time almost that you</b></p>	<p style="text-align: right;">Page 44</p> <p>1 <b>Do you know what this document is, Mr. Wright?</b></p> <p>2 A. It looks like -- No, but it says Plaintiff's</p> <p>3 Isaac Wright's Answers to the Defendant's first set of</p> <p>4 Interrogatories.</p> <p>5 <b>Q. Interrogatories. Yeah.</b></p> <p>6 <b>Do you remember seeing this document?</b></p> <p>7 A. I answered those questions.</p> <p>8 <b>Q. You answered these questions, okay. And at the</b></p> <p>9 <b>end you signed a verification saying that these are true</b></p> <p>10 <b>and correct responses; is that correct?</b></p> <p>11 A. Yeah. I believe so. I didn't see my signature</p> <p>12 at the bottom, so ...</p> <p>13 <b>Q. It says here -- Or you say here in your</b></p> <p>14 <b>response, Timothy Casey, Tito Reyes, Alex, and Omar were</b></p> <p>15 <b>all managers I had. I worked with Alex and Tito a lot.</b></p> <p>16 <b>They were my supervisors; is that correct?</b></p> <p>17 A. Yes. They the only managers.</p> <p>18 <b>Q. Why do you state that they're your supervisors</b></p> <p>19 <b>in this response?</b></p> <p>20 A. Because they are area managers.</p> <p>21 <b>Q. Just based on their title, is that why you call</b></p> <p>22 <b>them supervisors in your response?</b></p> <p>23 A. Yes, sir. Area manager is a supervisor, ain't</p> <p>24 it?</p>



<p style="text-align: right;">Page 45</p> <p>1 <b>Q. Did Timothy Casey, Tito Reyes, Alex, or Omar</b>  2 <b>ever promote you?</b>  3 A. No. What do you mean by promote? Rephrase the  4 question.  5 <b>Q. Did they ever give you a promotion at DRAIVER</b>  6 <b>or Driverdo?</b>  7 A. No.  8 <b>Q. Did they ever suspend you?</b>  9 A. One of them did.  10 <b>Q. And who was that?</b>  11 A. One of them got me suspended. I had to get  12 taken off the platform for two weeks. I believe that was  13 Tito.  14 <b>Q. You were taken off the platform?</b>  15 A. Yep.  16 <b>Q. When were you taken off the platform?</b>  17 A. Don't remember, but I know I was taken off for  18 two weeks.  19 <b>Q. Was it after an incident in which you ran into</b>  20 <b>a security guard with the car?</b>  21 A. No, sir. And I never ran into a security guard  22 with no vehicle.  23 <b>Q. Did you ever hit anybody with a vehicle while</b>  24 <b>doing a trip for DRAIVER?</b></p>	<p style="text-align: right;">Page 47</p> <p>1 A. I was told that Ford is the one that told  2 DRAIVER to get rid of me.  3 <b>Q. After that incident you signed up for -- you</b>  4 <b>drove again for DRAIVER; isn't that correct?</b>  5 A. Yes, that is correct. And they took me right  6 back off the platform.  7 <b>Q. Did you use a different name to drive for</b>  8 <b>DRAIVER?</b>  9 A. No. I used my name. Isaac.  10 <b>Q. And you only drove a couple trips; is that</b>  11 <b>correct?</b>  12 A. Yeah, I drove a few trips, yeah, before they  13 finally caught on that it was me.  14 <b>Q. So you created multiple accounts with DRAIVER?</b>  15 A. Just the original one and then a second one.  16 <b>Q. So the only time you were suspended from the</b>  17 <b>app was when -- after the Ford incident; is that correct?</b>  18 A. Yes, sir. I wasn't suspended. I was  19 terminated.  20 <b>Q. So you were never suspended from the app, you</b>  21 <b>were only terminated from the app?</b>  22 A. I was suspended -- Yes, I was suspended earlier  23 from DRAIVER because Tito felt some type of way because  24 he didn't like the response that I gave him. So whatever</p>
<p style="text-align: right;">Page 46</p> <p>1 A. No, sir.  2 <b>Q. Do you know what I'm referring to?</b>  3 A. Yes, sir.  4 <b>Q. What took place?</b>  5 A. What took place? Driverdo told me that they  6 only can review the camera at their discretion because I  7 told them that the man nev- -- I never hit the man with  8 the car. He turned around. If you looked on the camera,  9 he slapped -- he turned around and took his right --  10 which arm was that? Left -- right arm and slapped the  11 hood of my car and said, Now you done it. You're out of  12 here. You just hit me.  13 <b>Q. And where was this? Was this at a Ford</b>  14 <b>dealership?</b>  15 A. Yes, sir, it was.  16 <b>Q. And after that you couldn't use the app</b>  17 <b>anymore?</b>  18 A. No, sir. And when I called DRAIVER, DRAIVER  19 said they only review the camera at they discretion.  20 <b>Q. Do you know if Ford told DRAIVER they didn't</b>  21 <b>want you to drive on -- to take any trips on any other --</b>  22 <b>Strike that.</b>  23 <b>Do you know any communications before --</b>  24 <b>between Ford and DRAIVER regarding to the incident?</b></p>	<p style="text-align: right;">Page 48</p> <p>1 he told them, I ended up off the platform for two weeks.  2 <b>Q. When was this?</b>  3 A. Probably in '21. I believe it was in '21 or  4 '20. One of them years. Don't remember exactly, but I  5 know I was off the platform for two weeks because of him.  6 <b>Q. How do you know you were off the platform for</b>  7 <b>two weeks?</b>  8 A. Because -- When you go into the -- what's the  9 name -- into your app, you go inside the portal, and it  10 shows that you are inactive. You call the number, they  11 tell you why you were inactive.  12 <b>Q. So they told you you were inactive on the app?</b>  13 A. Yes, sir. Yes.  14 <b>Q. Did they give any explanation why?</b>  15 A. From, I guess, my assumption, he didn't like  16 the way I talked to him. That's the only thing I can  17 think of.  18 <b>Q. But no one told you were suspend from -- Tito</b>  19 <b>suspended you; is that correct?</b>  20 A. No one told me that Tito suspended me? No,  21 they wouldn't give his name. You know they wouldn't give  22 his name.  23 <b>Q. No one told you that somebody made the decision</b>  24 <b>to suspend you; is that correct?</b></p>

<p style="text-align: right;">Page 49</p> <p>1 A. He saying an area manager. And the only 2 conversation I had with an area manager was Tito. So 2 3 plus 2 is 4. 4 <b>Q. Was there a point in time when they told you</b> 5 <b>you were reactivated on the app?</b> 6 A. I was off the platform for two weeks, sir. 7 <b>Q. Did they tell you it was going to be two weeks</b> 8 <b>that you were off the platform?</b> 9 A. You'll be off the platform for two weeks. 10 You're suspended, actually, from the platform for two 11 weeks, yes. 12 <b>Q. And what was the reasoning why you were</b> 13 <b>suspended?</b> 14 A. Again, I assume that it is because the way I 15 must -- he didn't like the way I talked to him. I don't 16 know. Because after that, the little conversation 17 between me and him, I was suspended. 18 <b>Q. What took place during the conversation between</b> 19 <b>you and him?</b> 20 A. Tito has a problem with talking to people like 21 they're kids. His tone and the way he talks and the way 22 he directs is as if I'm a child, and I have to correct 23 him sometimes and let him know that I'm a grown man, he 24 cannot talk to nobody likes that.</p>	<p style="text-align: right;">Page 51</p> <p>1 about -- Probably more. Probably a little bit more, but 2 it sound about right. 3 <b>Q. Did you contact customer service or the area</b> 4 <b>managers through the DRAIVER app?</b> 5 A. Did I contact the area managers through the -- 6 Say that -- Rephrase that question, again. 7 <b>Q. Could you contact the area managers or customer</b> 8 <b>service through the DRAIVER app?</b> 9 A. Customer service, not the area managers. 10 <b>Q. So you could send messages, text messages to</b> 11 <b>customer service through the DRAIVER app?</b> 12 A. No, sir. You talk to them. You have to call 13 the number. Now they did a lot of texting, if that's 14 what you're trying to question. 15 <b>Q. And you could text customer service back?</b> 16 A. On that number? No, I don't believe so. I 17 don't believe so. And if you did, I don't know about it 18 because they didn't act like they ain't answered none of 19 my texts when I did, so I don't know for sure. 20 <b>Q. It says here that you work with Marcus Bounes?</b> 21 A. No, it's supposed to be Marcus Bounes, 22 B O U N -- 23 <b>Q. Bounes, Bounes, yeah. I'm having trouble</b> 24 <b>reading that. Marcus Bounes on a daily basis; is that</b></p>
<p style="text-align: right;">Page 50</p> <p>1 <b>Q. During the time you believe you were suspended,</b> 2 <b>did you talk to any other area managers?</b> 3 A. No -- Well, I don't know. I probably talked to 4 Alex. I don't know for sure but I prob- -- because I 5 talk to Alex a lot. 6 <b>Q. You state that Tito is an area manager; is that</b> 7 <b>correct?</b> 8 A. That's what he told me. 9 <b>Q. What -- Did Tito have a certain client he</b> 10 <b>oversaw that you know of?</b> 11 A. Penske. 12 <b>Q. So if you ever had an issue with a Penske trip,</b> 13 <b>you'd go to Tito?</b> 14 A. Yes, sir. Either Tito or Alex. 15 <b>Q. Did you do a lot of Penske trips when you were</b> 16 <b>using the app?</b> 17 A. Yes, sir. 18 <b>Q. Do you know how many trip in total you did</b> 19 <b>using the app?</b> 20 A. No, sir. DRAIVER will have that. 21 <b>Q. So if I state -- told you that you did</b> 22 <b>262 trips, does that sound right?</b> 23 A. Whatever DRAIVER has in they record, then 24 that's what I did. But 260, that sound -- that sound</p>	<p style="text-align: right;">Page 52</p> <p>1 correct? 2 A. I talked to him on a daily basis? 3 <b>Q. It says you worked with him on a daily basis.</b> 4 A. Oh, yes, yes, yes. Yes, I did. 5 <b>Q. Do Marcus Bounes usually do driver trips?</b> 6 A. Yes, sir. 7 <b>Q. And you would act as his chaser during that?</b> 8 A. Yes, sir. 9 <b>Q. Have you talked to Marcus Bounes about this</b> 10 <b>lawsuit?</b> 11 A. Have I talked to him? 12 <b>Q. Yeah.</b> 13 A. I reached out to him, but I didn't discuss the 14 case with him. 15 <b>Q. So he doesn't know anything -- you never told</b> 16 <b>him about this lawsuit?</b> 17 A. No, sir. He knows -- He knows about the 18 lawsuit, but he don't know the -- the contents of it. 19 <b>Q. I don't know how to say his name. Vla- --</b> 20 <b>Wladmir?</b> 21 A. Wladmir Coello. 22 <b>Q. Got it.</b> 23 A. Yes, sir. 24 <b>Q. Have you talked to him about the lawsuit?</b></p>



<p style="text-align: right;">Page 53</p> <p>1 A. Yes, sir. But I didn't discuss the contents.</p> <p>2 <b>Q. How do you talk to these individuals? Do you</b></p> <p>3 <b>talk to them through text message?</b></p> <p>4 A. No. Over the phone.</p> <p>5 <b>Q. Got it.</b></p> <p>6 <b>Mr. Wright, it states here, I wasn't</b></p> <p>7 <b>technically scheduled hours, but we had to work a certain</b></p> <p>8 <b>number of trips per week to remain active on the app they</b></p> <p>9 <b>had. How many trips a week did you have to work to stay</b></p> <p>10 <b>active the app?</b></p> <p>11 A. I know that we had to take like -- I forgot the</p> <p>12 number, but we had to do a -- we had to do a certain</p> <p>13 number of trips or they would take us off. We wouldn't</p> <p>14 be active. I forgot the number. It's been a while. But</p> <p>15 we had to do certain numbers in order to remain active on</p> <p>16 the trip.</p> <p>17 <b>Q. Wasn't there a number of weeks that you didn't</b></p> <p>18 <b>do any rides and you remained active?</b></p> <p>19 A. A number of weeks that I didn't do any rides?</p> <p>20 <b>Q. Yes.</b></p> <p>21 A. Where is that located at?</p> <p>22 <b>Q. Do you know if there's weeks that you did not</b></p> <p>23 <b>do any rides on the DRAIVER app between 20- --</b></p> <p>24 A. The only thing that I can remember out of maybe</p>	<p style="text-align: right;">Page 55</p> <p>1 <b>figure out when you did your trips with the DRAIVER app?</b></p> <p>2 A. Yes, sir. If they haven't took that away.</p> <p>3 That is wrong.</p> <p>4 <b>Q. Do you believe there's more weeks than the one</b></p> <p>5 <b>that you did not perform any trips between August 2020</b></p> <p>6 <b>and January 2022?</b></p> <p>7 A. I don't believe so. And then I don't even see</p> <p>8 it on here that I missed a week. If this came from</p> <p>9 DRAIVER.</p> <p>10 <b>Q. So you could go in your app right now and</b></p> <p>11 <b>determine if you did any trips between December 14th of</b></p> <p>12 <b>2020 and December 27th of 2020; is that correct?</b></p> <p>13 A. If I still have access, sir. I said that</p> <p>14 before. You just asked me that. I'll say it again. If</p> <p>15 I still have access.</p> <p>16 <b>Q. Do you have access?</b></p> <p>17 A. I don't know.</p> <p>18 <b>Q. You can look right now, can't you?</b></p> <p>19 A. I can look.</p> <p>20 <b>Q. Can you please look and see if you have access</b></p> <p>21 <b>to your app?</b></p> <p>22 A. I don't remember my credentials, but you want</p> <p>23 me to put some credentials in here? Actually, I can't</p> <p>24 even pull the app up now. Well, wait a minute. Nope.</p>
<p style="text-align: right;">Page 54</p> <p>1 a week that I took that -- my week vacation. That was</p> <p>2 the only week that I took off, but I was back at work</p> <p>3 that following Sunday or Monday.</p> <p>4 <b>Q. So the week you turned your -- or took off, you</b></p> <p>5 <b>still remained active after that on the app?</b></p> <p>6 A. I guess so because I did -- Do you how many</p> <p>7 trips I got underneath my belt? So of course that one</p> <p>8 week is not going to stop me from being active. I got a</p> <p>9 lot of trips under my belt.</p> <p>10 <b>Q. Okay. I'm going to mark -- I'm going to skip</b></p> <p>11 <b>exhibits. I'm going to mark this Exhibit 6.</b></p> <p>12 A. We went from 2 to 6. Oh, yes.</p> <p>13 <b>Q. Mr. Wright, have you ever seen this document?</b></p> <p>14 A. No, I don't even know what this is.</p> <p>15 <b>Q. Do you know when you did your first trip for</b></p> <p>16 <b>DRAIVER through the DRAIVER app?</b></p> <p>17 A. It's in the app. According to this thing it</p> <p>18 says that I did it -- my first trip, August 3rd of 2020.</p> <p>19 <b>Q. Does that refresh your recollection on when you</b></p> <p>20 <b>did your first trip? Do you believe that's correct?</b></p> <p>21 A. It sounds familiar. But I don't know exactly</p> <p>22 until I -- I have to go into my app and look at it and go</p> <p>23 all the way down to the bottom.</p> <p>24 <b>Q. So you today, you can go into your app and</b></p>	<p style="text-align: right;">Page 56</p> <p>1 It's not even letting me -- It's talking about put in my</p> <p>2 user name and password. I don't remember that. At first</p> <p>3 I didn't have to do all that, just pop on.</p> <p>4 <b>Q. Overall you were never removed from the app for</b></p> <p>5 <b>not performing a certain amount of trips; is that</b></p> <p>6 <b>correct?</b></p> <p>7 A. No, because I went over and beyond. They</p> <p>8 changed the rules.</p> <p>9 <b>Q. Do you remember when you took your week</b></p> <p>10 <b>vacation?</b></p> <p>11 A. Really, I don't. But I know it was some</p> <p>12 time -- I don't know. I don't remember. But I went to</p> <p>13 Vegas. I do know that.</p> <p>14 <b>Q. Nice.</b></p> <p>15 A. Other than that I was working with DRAIVER</p> <p>16 constantly. I believe so.</p> <p>17 <b>Q. When you're doing Chase trips, they never told</b></p> <p>18 <b>you to wear a certain uniform, did they?</b></p> <p>19 A. Depends on the trip, sir.</p> <p>20 <b>Q. Did you -- Were you ever provided any clothing</b></p> <p>21 <b>with the DRAIVER logo or Driverdo logo?</b></p> <p>22 A. No, sir.</p> <p>23 <b>Q. But for some -- Some companies that you perform</b></p> <p>24 <b>trips for them, you're supposed to dress a certain way;</b></p>

<p style="text-align: right;">Page 57</p> <p>1 is that correct?</p> <p>2 MR. QUALLS: Objection to form.</p> <p>3 BY MR. BENSON:</p> <p>4 Q. You can still answer if you understand the</p> <p>5 question. Unless he tells you not to respond, but ...</p> <p>6 MR. QUALLS: You can go ahead and answer,</p> <p>7 Mr. Wright.</p> <p>8 BY THE WITNESS:</p> <p>9 A. On the app we was told to dress a certain way</p> <p>10 if we were doing certain trips. They had a contract</p> <p>11 with -- I forgot the name of the people, but we had to go</p> <p>12 pick the customer car where the -- the car up from the</p> <p>13 customer's house, and we have to be in casual. We</p> <p>14 couldn't just wear like our regular -- what we wear</p> <p>15 regular to do the trips. It had to be casual wear.</p> <p>16 Q. Was this CarMax trips?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Was that a request of CarMax?</p> <p>19 A. I do not know. It could have been of a request</p> <p>20 of DRAIVER.</p> <p>21 Q. Was that --</p> <p>22 A. It did say CarMax in the notes, that CarMax</p> <p>23 said that you need to be dressed this way. It just said</p> <p>24 for this trip you need to dress formal. It did not say --</p>	<p style="text-align: right;">Page 59</p> <p>1 certain companies?</p> <p>2 A. They only accepted trips with certain area</p> <p>3 managers? Yes.</p> <p>4 Q. But what about certain companies?</p> <p>5 A. Some drivers did that too because they didn't</p> <p>6 like Budget because Budget was deep into Indiana, and you</p> <p>7 lose a lot of reception. And then a lot of them trucks</p> <p>8 wasn't working, and then they make you stay there 'til</p> <p>9 they find you a truck, and you can't leave, and you in a</p> <p>10 deep part of Indiana at night, and that's not good</p> <p>11 especially on my looks.</p> <p>12 Q. Was there any customers that you would not</p> <p>13 accept, or companies you would not accept trips from, or</p> <p>14 to?</p> <p>15 A. No, not that many. Not that many. Not many</p> <p>16 because I damn near took everything. I almost took</p> <p>17 everything, should I say. I don't know. I don't</p> <p>18 remember. All I know is DRAIVER was my only source of</p> <p>19 income, and that's how my bills was getting paid. So me</p> <p>20 not accepting a trip was not me. I had to work.</p> <p>21 Q. Did DRAIVER provide you anything to perform any</p> <p>22 of your trips?</p> <p>23 A. Did they provide anything?</p> <p>24 Q. Yeah.</p>
<p style="text-align: right;">Page 58</p> <p>1 it did not put any pacifics on if CarMax said it or</p> <p>2 DRAIVER said it.</p> <p>3 Q. Was that request, to wear nicer clothes, just</p> <p>4 specific to CarMax trips?</p> <p>5 A. That I can think of.</p> <p>6 Q. What companies did you do trips for? Do you</p> <p>7 remember?</p> <p>8 A. Penske, Budget, U-Haul, and Morgan Corp.</p> <p>9 Q. And you didn't have to -- you weren't told or</p> <p>10 there wasn't anything on the notes on anything you needed</p> <p>11 to wear for any of those trips, correct?</p> <p>12 A. No, sir.</p> <p>13 Q. Did you do a lot of CarMax trips?</p> <p>14 A. No, sir.</p> <p>15 Q. Do you know how many CarMax trips you did?</p> <p>16 A. Don't remember, sir. I know it wasn't that</p> <p>17 many because I didn't like dressing up.</p> <p>18 Q. Is not that many under five trips?</p> <p>19 A. Probably so. I don't remember. I can't give</p> <p>20 you a designated number. But it know it wasn't that</p> <p>21 many, like it wasn't, yeah, that many at all because I</p> <p>22 don't like dressing up.</p> <p>23 Q. Do you know if certain users, drivers, or</p> <p>24 chasers only accepted trips for certain customers -- for</p>	<p style="text-align: right;">Page 60</p> <p>1 A. Do rent vehicles for me, do that count?</p> <p>2 Q. At times they rented vehicles for you?</p> <p>3 A. Yes, sir, because they wanted this trip done</p> <p>4 that bad.</p> <p>5 Q. So what would they do? They'd rent a larger</p> <p>6 vehicle for you? Is that what took place?</p> <p>7 A. Yes, sir. Yes, sir.</p> <p>8 Q. That wouldn't happen very often, would it?</p> <p>9 A. Oh, yeah, that happened very often. Very</p> <p>10 often.</p> <p>11 Q. How many times did that happen?</p> <p>12 A. Depends on how many trips they got that week.</p> <p>13 That consists of them needing me to get a van or a larger</p> <p>14 vehicle to move it because they know I was willing to</p> <p>15 work.</p> <p>16 Q. And that's when you were doing a chaser duty</p> <p>17 when there was more than five drivers you needed to pick</p> <p>18 up?</p> <p>19 A. Yes, sir. Chaser position got changed because</p> <p>20 of my performance.</p> <p>21 Q. Excuse me? I didn't hear what you just said.</p> <p>22 A. I said that chaser position got changed because</p> <p>23 of my performance.</p> <p>24 Q. How did they change the position based on your</p>

<p style="text-align: right;">Page 61</p> <p>1 performance?</p> <p>2 A. Because like I told you when you asked me</p> <p>3 earlier did I go over and beyond? Because of my over and</p> <p>4 beyond, they took my over and beyond and made it as a</p> <p>5 requirement.</p> <p>6 Q. What do you mean they made it as a requirement?</p> <p>7 A. You don't understand that?</p> <p>8 Q. I don't. What did they make a requirement, I</p> <p>9 guess?</p> <p>10 A. As far as say if snow -- say if it snowed that</p> <p>11 day, or any of them, they got it where -- Because it</p> <p>12 wasn't at first. All you had to do was follow the</p> <p>13 drivers, put them to the destination, and then you</p> <p>14 followed the drivers back -- I mean, pull you up to where</p> <p>15 you're going, pick up the truck, and then you follow the</p> <p>16 driver. But I was -- When it was snowing, I brought -- I</p> <p>17 bought jumper cables, I bought snow brushes, stuff like</p> <p>18 that so when the driver get there instead of us waiting</p> <p>19 for somebody to come jump it or because they don't have</p> <p>20 brushes or nothing like that, I had that, I cleaned that.</p> <p>21 So then when I went to look at a chaser position after</p> <p>22 that, I noticed that this is what they're requiring now.</p> <p>23 And me and Marcus looked at it because I actually saw</p> <p>24 Marcus, and both of us laughed. And he said they only</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. You're a professional driver, you knew what to</p> <p>2 do.</p> <p>3 A. I just love the job. I love the job. That's</p> <p>4 why I did it.</p> <p>5 Q. But you weren't required to bring the jumper</p> <p>6 cables?</p> <p>7 A. No, sir. Because this is my only source of</p> <p>8 income, I did what I had to do to keep my income flowing.</p> <p>9 Q. So by bringing those things, if you ran into</p> <p>10 issues, you could get places quicker; is that correct?</p> <p>11 A. Yes, sir. We don't have to wait on the area</p> <p>12 manager for four and five hours to get us moving. Once</p> <p>13 again, it's not a good feeling to be stuck on the side of</p> <p>14 Indiana at nighttime.</p> <p>15 Q. So essentially you made decisions on how to</p> <p>16 manage some of the trips overall?</p> <p>17 A. Yes, sir. And did they like it? Yes, sir.</p> <p>18 Q. And you used your skill and knowledge to manage</p> <p>19 those, and what you learned from driving?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Okay.</p> <p>22 A. Plus you got to have a passion for it. If you</p> <p>23 don't have no passion, then you wouldn't do it. I have a</p> <p>24 passion for DRAIVER. That's why I did it.</p>
<p style="text-align: right;">Page 62</p> <p>1 changed it because of how you do it.</p> <p>2 Q. Oh, so they started requiring chasers to also</p> <p>3 provide -- have jumper cables and --</p> <p>4 A. Do a little bit more extra work. Do a little</p> <p>5 bit more extra work? Yes.</p> <p>6 Q. To perform the duties they said you needed</p> <p>7 jumper cables and --</p> <p>8 A. Yes, sir --</p> <p>9 Q. -- and stuff to get out of the snow?</p> <p>10 A. To do a little more extra work, sir. Do not</p> <p>11 put words in my mouth. To do a little bit more extra</p> <p>12 work.</p> <p>13 Q. I just don't -- I don't understand.</p> <p>14 A. Whatever that consists to do -- the chaser</p> <p>15 jobs -- The chaser is now doing extra work. Now whatever</p> <p>16 that extra work was, was some of the obligations I was</p> <p>17 fulfilling. So did they necessarily say you have to have</p> <p>18 a jumper cable in there? No. Did you necessarily have</p> <p>19 that? No. But some of the extra work that I was doing</p> <p>20 is in the notes. Do I know offhand? No. But I wish I</p> <p>21 had took a picture of it so I could have read it to you.</p> <p>22 Q. Because you're a professional driver that you</p> <p>23 did those things; isn't that correct?</p> <p>24 A. Because I'm a who?</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. All right. One second. Mr. Wright, if you</p> <p>2 ever need a break, you just say it, okay?</p> <p>3 A. I understand.</p> <p>4 Q. Mr. Wright, you don't have any documents</p> <p>5 outlining the amount of time you spent on trips, do you,</p> <p>6 for DRAIVER?</p> <p>7 A. No, sir. But I believe DRAIVER do. Because at</p> <p>8 the end of the trip they shows you how long you was on</p> <p>9 that trip.</p> <p>10 Q. You needed to -- After a trip -- When you</p> <p>11 finished a trip, did you have to close out a trip? Is</p> <p>12 that how it worked?</p> <p>13 A. Yes, sir. Yes, sir.</p> <p>14 Q. And then after you closed out the trip, it</p> <p>15 would tell you how long the trip was?</p> <p>16 A. Yes, sir. And then after that I can't see it</p> <p>17 no more. It just showed the price.</p> <p>18 Q. Got it. So once you closed out the trip, is</p> <p>19 that when you would get paid?</p> <p>20 A. No, it'll come over the -- Everything got to be</p> <p>21 put in there. My mileage had to be put in there, so ...</p> <p>22 The base pay will show up there, the mileage and stuff</p> <p>23 won't get in until the area manager go back and -- I</p> <p>24 believe the area manager go back and fixes it.</p>

<p style="text-align: right;">Page 65</p> <p>1 Q. Have you ever worked a company in which you 2 received an employee handbook? 3 A. Have I worked at a company where I received an 4 employee handbook? 5 Q. Yeah. 6 A. Yeah. Probably when I first started working. 7 Q. DRAIVER or Driverdo never provided you an 8 employee handbook; is that correct? 9 A. They didn't put me no handbook, but they had a 10 set of rules I had to follow. 11 Q. And are you referring to the terms and 12 conditions? 13 A. Yes. 14 Q. Did you ever receive any e-mails from DRAIVER 15 or Driverdo or anybody employed by the company? 16 A. From DRAIVER? 17 Q. Yeah. 18 A. I've seen a lot of e-mails about -- Concerning 19 what? 20 Q. So you received e-mails from DRAIVER or 21 Driverdo? Or was it just text messages? 22 A. Yeah, before. I got e-mails too. 23 Q. Have you looked through your e-mails in this 24 case to see what you have, or no?</p>	<p style="text-align: right;">Page 67</p> <p>1 A. A trip. 2 Q. In these text messages, are you negotiating for 3 a rate of pay to perform a trip? 4 A. Yep. Because DRAIVER has a habit of when we 5 get there and a truck that's not there is not there, they 6 have a habit of saying that we cannot leave until they 7 either re-assign or find another truck. If they can't 8 find, there you dry run. So instead of me waiting all 9 that time, I ax for extra money because you're going to 10 have me waiting. I cannot move until you tell me so, or 11 there will be again repercussions. So why don't I ax for 12 more money if I'm sitting there waiting? 13 Q. And then at the end he agreed to give you extra 14 money? 15 A. Yes, sir. He wanted that trip done. 16 There's some text message -- I don't where it's 17 at, but there's some text messages in there, he didn't 18 give me the money for it. 19 Q. And this next message we're looking at, 20 Wright 16. 21 A. Mm-hmm. 22 Q. You're asking him for another trip; is that 23 correct? 24 A. I was letting him know that after we drop the</p>
<p style="text-align: right;">Page 66</p> <p>1 A. No. 2 Q. I'm going to ask -- Later after this I'm going 3 to ask your attorney to have you look through those. 4 Did any area manager ever provide you a written 5 performance evaluation? 6 A. No, sir. 7 Q. Was there ever any companywide meetings through 8 DRAIVER or Driverdo? 9 A. The only thing they had to say, normally they 10 put it on the app. Or they send out a mass text. 11 Q. I'm going to -- I'm going to mark this as 12 Exhibit 4. I'll go slowly through this. These are 13 documents that you provided. I'm looking at Wright 1 to 14 Wright 24. 15 Mr. Wright, do you recognize these documents -- 16 these documents? 17 A. Those are text messages from Tito. 18 Q. I'm looking at Wright 15. 19 Mr. Wright, is this -- Are these text 20 messages -- What's going on on this -- in these text 21 messages on this page? 22 A. Conversation between me and Tito. 23 Q. And what are guys talking about? Do you 24 remember?</p>	<p style="text-align: right;">Page 68</p> <p>1 truck off, that, yeah, we are free if you want to send us 2 a trip. 3 Q. And is he giving you options for two different 4 trips? 5 A. No, they just want one of them short trips in 6 Elk Grove Village, it sounds like ... 7 Q. Was he offering a trip from Bedford Park as 8 well? 9 A. No. He was asking did I want to do it out of 10 Bedford Park, or do I want to do it out of Elk Grove. 11 Q. Got it. What are Kavak (phonetic) employees, 12 what does that mean? 13 A. There was four employees -- I mean four 14 individuals that was from -- I don't know. If they was 15 telling me right, they were supposed to be from Mexico 16 that was thinking about purchasing a piece of DRAIVER, 17 and they called me because -- Who said that? They felt 18 like I was a -- a model employee, and they thought -- 19 they felt like I would be a good fit for the four people 20 to get up information about the company. 21 Q. You're showing them a route, a trip? 22 A. Yes, sir. About DRAIVER and how they move. 23 And yeah, they called me to do that trip -- I mean to do 24 that.</p>

<p style="text-align: right;">Page 69</p> <p>1 Q. Is it fair to say when going through these          2 texts, and I don't know if you reviewed all these texts          3 before your deposition, but do you remember if most of          4 these texts involved you having issues, you bringing them          5 to Tito, regarding trips?          6 A. I don't say all of it. Some is issues, some is          7 axing for trips, some is axing for pay, some is slow down          8 how you talking to me because I -- I keep all my textes,          9 so watch how you talk to me. There's a lot of -- me and          10 Tito had a lot of conversations.          11 Q. Sorry. I'm going back to this.          12 We're looking at Wright 11. You have the          13 ability to change the times -- the trip start times; is          14 that correct?          15 A. Do we have the ability to do it?          16 Q. Yes.          17 A. We supposed to have the ability to do it. But          18 as you can see in this text, there's a problem with that.          19 Q. So on certain trips you had the ability to          20 change the start time and end time of trips?          21 A. As an independent contractor, we supposed to.          22 But as you see in this text, it was a problem.          23 Q. Here are you telling Tito that you are an          24 independent contractor in this text?</p>	<p style="text-align: right;">Page 71</p> <p>1 A. Yes, I did.          2 Q. So you and a certain -- certain individuals          3 planned ahead to accept or deny trips together?          4 A. Plan to accept or deny trips? No. Do we -- Do          5 we cover trips? Yes.          6 Q. Would you make decisions with other drivers on          7 what trips to accept?          8 A. Do I make a decision? No, I do not. Do the          9 drivers call me and tell me? Yes, they do.          10 Q. So would you ever talk to Marcus, Hey, Marcus,          11 let's plan on taking this trip together?          12 A. Me and Marcus? Yeah. That's why me and Marcus          13 talk.          14 Q. So you planned trips with other drivers before          15 you accepted them?          16 A. I planned trips? What do you mean? Rephrase          17 that. What do you mean planned trips? Because the trips          18 are not planned, they just pop up there and we decide if          19 we going to grab them or not. And then that's --          20 Q. That's -- Yeah. Thank you for clarifying. You          21 answered that question.          22 So you decided with other drivers or users or          23 chasers to accept certain trips together?          24 A. Yes.</p>
<p style="text-align: right;">Page 70</p> <p>1 A. Yes, sir.          2 Q. And you believed you were an independent          3 contractor?          4 A. That's what I thought I signed up for.          5 Q. And here you're getting mad because he told you          6 you couldn't change the time of the trip?          7 A. Yes, because he's treating me like an employee,          8 yes.          9 Q. Is it because when you change the time of a          10 trip, it at times has an affect of other users, drivers,          11 chasers, not wanting to do the time that you chose?          12 A. No, sir. I mean, some drivers, they felt some          13 type of way. But I will always call my drivers and get a          14 heads up before I do anything. Before any time exchange,          15 I always get in contact with the drivers. Now, he had          16 drivers that felt like they could do and say whatever          17 they want to. And as you see in that text, he backs them          18 up.          19 Q. You called them your drivers. What do you mean          20 by your drivers?          21 A. The drivers. Correction. The drivers. Not my          22 drivers, the drivers.          23 Q. Did you have a team of drivers you interacted          24 with to take trips on -- to take trips with?</p>	<p style="text-align: right;">Page 72</p> <p>1 Q. Would you strategize with the other drivers and          2 chasers what routes to take on trips?          3 A. Sometimes. Because the drivers may know that          4 area better than I do.          5 Q. Would you discuss with the users, drivers, and          6 chasers when to start trips?          7 A. Do we discuss the times? That's the main          8 reason why we call about the time.          9 Q. So it's not the time always that was listed on          10 the app when to start, but you guys would talk and decide          11 when to start going that route?          12 A. Sometimes the time on the app be for 5:00, and          13 then other times we just start a little earlier.          14 Q. Okay.          15 A. And then they start having problems with that.          16 That's why we started getting into it, because of that,          17 because we started -- starting trip early. We started          18 doing stuff that says we independent contractors, and          19 they didn't like that.          20 Q. Would you and the other drivers and chasers          21 decide together when to take breaks?          22 A. Take breaks?          23 Q. Yeah. Go off the road, have a bite of food,          24 relax.</p>



<p style="text-align: right;">Page 73</p> <p>1 A. No. When they stop and get gas is when they</p> <p>2 grab something to eat.</p> <p>3 <b>Q. But you could at any time stop and get off the</b></p> <p>4 <b>road and get something to eat or drink during the trip?</b></p> <p>5 A. Yeah, we could. It depends on the trip.</p> <p>6 Again, it depends on the trip.</p> <p>7 <b>Q. What do you mean it depends on the trip?</b></p> <p>8 A. It depends on the trip. Like if the drivers</p> <p>9 want to do that, it depends on the trip. We try -- If we</p> <p>10 got a longer destination to go to, they tend not to go</p> <p>11 and stop and, you know, sit down and eat or nothing like</p> <p>12 that. They'll just, when they get some gas, grab</p> <p>13 something out the gas station and keep on going. So</p> <p>14 again, it depends on the trip.</p> <p>15 <b>Q. You were never told by any area managers not to</b></p> <p>16 <b>take a break or get gas or get food on a trip; is that</b></p> <p>17 <b>correct?</b></p> <p>18 A. Was I ever told not to?</p> <p>19 <b>Q. Yeah.</b></p> <p>20 A. Not that I can recollect right now.</p> <p>21 MR. BENSON: All right. I need a ten more minute</p> <p>22 break.</p> <p>23 THE VIDEOGRAPHER: We're going to go off the video</p> <p>24 record. The time is 12:41 p.m. Central Time.</p>	<p style="text-align: right;">Page 75</p> <p>1 <b>second. Based on looking at Exhibit 6, do you still</b></p> <p>2 <b>believe you started accepting trips for DRAIVER in 2019,</b></p> <p>3 <b>or could you have started in August of 2020 accepting</b></p> <p>4 <b>trips?</b></p> <p>5 A. Well, I could have started in August. If this</p> <p>6 says August, then that's when I started. But I -- That</p> <p>7 don't look right to me, as of 2020. Because I moved into</p> <p>8 my house in June of '19, so that can't be right.</p> <p>9 <b>Q. So you moved into your house in June of 2019?</b></p> <p>10 A. I was working for DRAIVER that year, so I don't</p> <p>11 understand how it's only 2020 on them.</p> <p>12 <b>Q. Okay. Let's go to the second -- I'm going to</b></p> <p>13 <b>mark this Exhibit 11. We will go through this document</b></p> <p>14 <b>real quick. Do you recognize these documents,</b></p> <p>15 <b>Mr. Wright?</b></p> <p>16 A. It looks like a 1099 form. It got my name on</p> <p>17 it.</p> <p>18 <b>Q. And this is the correct address?</b></p> <p>19 A. Yes, it is.</p> <p>20 <b>Q. Do you remember seeing these -- receiving these</b></p> <p>21 <b>1099s?</b></p> <p>22 A. I probably did.</p> <p>23 <b>Q. Do you remember receiving a 1099 for 2019?</b></p> <p>24 A. I don't know. I probably did. I don't</p>
<p style="text-align: right;">Page 74</p> <p>1 (A short break was had.)</p> <p>2 THE VIDEOGRAPHER: This is the start of Media Label</p> <p>3 No. 3. We are going back on the video record. The time</p> <p>4 is 12:54 p.m. Central Time.</p> <p>5 BY MR. BENSON:</p> <p>6 <b>Q. All right. I'm going to share what I'm going</b></p> <p>7 <b>to mark Exhibit 8. I'm going to go over it slowly. Keep</b></p> <p>8 <b>going through.</b></p> <p>9 <b>Mr. Wright, do you know -- Do you know if</b></p> <p>10 <b>you've ever seen this document?</b></p> <p>11 A. No.</p> <p>12 <b>Q. You don't know?</b></p> <p>13 A. No, I don't remember seeing this. It says it's</p> <p>14 been revised March 2nd, 2020. I don't remember seeing</p> <p>15 this.</p> <p>16 <b>Q. But you do remember agreeing to DRAIVER's terms</b></p> <p>17 <b>of service at some point?</b></p> <p>18 A. I believe so if I got on the app -- if I got on</p> <p>19 the platform.</p> <p>20 <b>Q. So if these are DRAIVER's terms of service in</b></p> <p>21 <b>August --</b></p> <p>22 A. Of 2019 when I started? It says last updated</p> <p>23 March 2nd of 2020, so of course it cannot be.</p> <p>24 <b>Q. I'm going to switch over to Exhibit 6 for a</b></p>	<p style="text-align: right;">Page 76</p> <p>1 remember. But I do remember moving into my home in '19,</p> <p>2 and I do remember working for DRAIVER that following -- a</p> <p>3 few months later. So unless it's -- They put down</p> <p>4 whatever they put down, but that's what I remember.</p> <p>5 <b>Q. Do you remember in 2020 if you made \$8,189.65</b></p> <p>6 <b>working for DRAIVER?</b></p> <p>7 A. When I first started working for them, that</p> <p>8 sounds about right. I don't know. I don't know.</p> <p>9 Whatever they got down is what it is because I don't</p> <p>10 know.</p> <p>11 <b>Q. Okay. In 2021 was this the only income you</b></p> <p>12 <b>made the whole year, \$25,085.31?</b></p> <p>13 A. If that's what it says, sir.</p> <p>14 <b>Q. You never received a W-2 from DRAIVER; is that</b></p> <p>15 <b>correct?</b></p> <p>16 A. Not that I know of, sir.</p> <p>17 <b>Q. Okay. I'm going to mark this as Exhibit 12.</b></p> <p>18 MR. BENSON: Colby, this is going to be the Excel</p> <p>19 Spreadsheet I sent yesterday. We tried to produce it to</p> <p>20 you, but it -- it was hard to produce through a PDF, so I</p> <p>21 sent it.</p> <p>22 BY MR. BENSON:</p> <p>23 <b>Q. I'm going to go through this slowly.</b></p> <p>24 <b>Mr. Wright, do you recognize this document?</b></p>

<p style="text-align: right;">Page 77</p> <p>1 A. Yeah.</p> <p>2 <b>Q. I shouldn't say do you recognize this document.</b></p> <p>3 <b>Do you recognize any of these communications or remember</b></p> <p>4 <b>any communications that's on here -- that are on here?</b></p> <p>5 A. Look like stuff that they done sent to me.</p> <p>6 <b>Q. So would they send things to you outlining if</b></p> <p>7 <b>your trip's been cancelled?</b></p> <p>8 A. Yep. That means that they took the trip from</p> <p>9 me and gave it to somebody else.</p> <p>10 <b>Q. Is it also that the client could have -- could</b></p> <p>11 <b>have cancelled the trip?</b></p> <p>12 A. I thought at first. I did. I did. Until I</p> <p>13 start seeing the trip that I was taken from given to</p> <p>14 somebody else.</p> <p>15 <b>Q. What do you mean here, Do we dry run this trip?</b></p> <p>16 A. So if we pulling up as an independent</p> <p>17 contractor, if they pull up to -- they have a trip, and</p> <p>18 we get to that destination as an independent contractor,</p> <p>19 if the truck is not there, then we dry run. We're</p> <p>20 supposed to dry run because our intended target was to</p> <p>21 pick up that truck. So we can't do that because we're</p> <p>22 not independent contractors, so we have to ax them, and</p> <p>23 they have to -- we have to wait while they go find</p> <p>24 another truck for us, or if they can find a truck. If</p>	<p style="text-align: right;">Page 79</p> <p>1 truck is not there or whatever their excuse is because we</p> <p>2 can't leave or do anything until they give us the say so.</p> <p>3 <b>Q. So, yeah, you can't perform the trip if you</b></p> <p>4 <b>can't get the truck; is that right?</b></p> <p>5 A. The trip was performed when I went down there.</p> <p>6 Because the truck is not there, that is not my problem.</p> <p>7 I only 'posed to do what's in the notes and to pick up</p> <p>8 that truck. But when I go and do that, they say it's a</p> <p>9 problem. Don't move until we tell you to.</p> <p>10 <b>Q. But at times they'd say, Okay. Truck's not</b></p> <p>11 <b>coming, dry run it, and you'll get paid?</b></p> <p>12 A. Yeah, after so many hours, sir.</p> <p>13 <b>Q. So at times the companies wouldn't have the</b></p> <p>14 <b>trucks where they said they would be in the notes? Is</b></p> <p>15 <b>that what --</b></p> <p>16 A. Yes, sir. A lot of times.</p> <p>17 <b>Q. Was there a trip you performed that you didn't</b></p> <p>18 <b>get paid for?</b></p> <p>19 A. The very last trip that I was on, I didn't get</p> <p>20 paid for it because that worker said that I hit him, so</p> <p>21 they didn't pay me for that trip.</p> <p>22 <b>Q. But all other trips you performed you got paid</b></p> <p>23 <b>for?</b></p> <p>24 A. No, sir. There was a trip that because the</p>
<p style="text-align: right;">Page 78</p> <p>1 they can't find a truck, that's when I send this answer,</p> <p>2 Do we dry run this trip? Because as an independent</p> <p>3 contractor, we're supposed to be able to dry run without</p> <p>4 axing.</p> <p>5 <b>Q. So dry run the trip means you go, you don't</b></p> <p>6 <b>pick up a truck because it's not there, and then because</b></p> <p>7 <b>it's not there you still get paid?</b></p> <p>8 A. Yeah. We suppose to get paid, yes, sir, but</p> <p>9 that's never the case.</p> <p>10 <b>Q. Would you -- Would you have communications with</b></p> <p>11 <b>individuals that work for the company such as Penske or</b></p> <p>12 <b>Budget or CarMax on trying to figure out --</b></p> <p>13 A. With who?</p> <p>14 <b>Q. -- truckswere (phonetic) or carswere</b></p> <p>15 <b>(phonetic)?</b></p> <p>16 A. Do we have to call them?</p> <p>17 <b>Q. Yes.</b></p> <p>18 A. If the area manager didn't feel like doing it,</p> <p>19 yes.</p> <p>20 <b>Q. So you had to communicate with employees of</b></p> <p>21 <b>Penske or Budget in performing the trucks at times?</b></p> <p>22 A. Yeah. I talk to them to check and see if the</p> <p>23 truck was there, or to ax them to call our area manager</p> <p>24 to let them know that the truck has been taken or the</p>	<p style="text-align: right;">Page 80</p> <p>1 Budget truck wasn't there, we dry run it, on our way back</p> <p>2 he finally found the truck so we had to go back. So he</p> <p>3 took that money that we supposed to got for the trip when</p> <p>4 the truck wasn't there, he took that back from us and</p> <p>5 only paid for the truck that he found.</p> <p>6 <b>Q. So you did get paid that day for performing a</b></p> <p>7 <b>trip?</b></p> <p>8 A. A trip that they felt like was successful.</p> <p>9 But that trip that I just went there for and</p> <p>10 didn't get paid because he took the pay for, that's just</p> <p>11 money lost, I guess, because I didn't get it.</p> <p>12 <b>Q. But you didn't get all the way home before you</b></p> <p>13 <b>turned around to actually perform a trip with a truck?</b></p> <p>14 A. The trip was 160-something hours, if I'm not</p> <p>15 mistaken. I was 40 miles away from dropping them drivers</p> <p>16 off when they changed they mind.</p> <p>17 <b>Q. And they say go back and pick up a different</b></p> <p>18 <b>truck, is that what it was?</b></p> <p>19 A. Yes, sir. Or don't get paid.</p> <p>20 <b>Q. Do you know when that took place?</b></p> <p>21 A. That's when Victor Fields was working for us.</p> <p>22 I don't remember that. But I do know that was on my</p> <p>23 trip.</p> <p>24 <b>Q. So you felt you were underpaid that day for the</b></p>

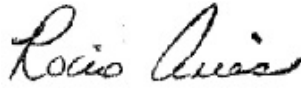


<p style="text-align: right;">Page 81</p> <p><b>1 amount of miles you drove?</b></p> <p>2 A. Yeah, I didn't get paid. I didn't get paid. I</p> <p>3 got paid for whatever they felt was sufficient for me to</p> <p>4 get paid. I drove all the way out there.</p> <p><b>5 Q. Do you have anything in writing or in text</b></p> <p><b>6 messages regarding that trip?</b></p> <p>7 A. I don't know. I have to look it up, sir.</p> <p>8 Knowing me, if he did it in a text, I might have kept it</p> <p>9 because I try not -- I try not to get rid of none of that</p> <p>10 because the way they was talking and what they was doing.</p> <p><b>11 Q. So when you're looking back, could you only</b></p> <p><b>12 find text messages you had between you and Tito?</b></p> <p>13 A. Yeah. I got all the text messages with Tito.</p> <p>14 What do you mean?</p> <p><b>15 Q. Could you find any other texts you had with</b></p> <p><b>16 any -- anything else related to taking trips on Driverdo</b></p> <p><b>17 or DRAIVER?</b></p> <p>18 A. I have to look, sir. Don't know offhand, but I</p> <p>19 would have to look.</p> <p><b>20 Q. Do you have texts with other hikers or chasers</b></p> <p><b>21 you were performing trips with?</b></p> <p>22 A. Yes, sir.</p> <p><b>23 Q. So you'd have -- Have you looked through your</b></p> <p><b>24 text messages to see what you have regarding the other</b></p>	<p style="text-align: right;">Page 83</p> <p>1 because I got into it with Tito. Not because my app</p> <p>2 wasn't working, because I got into it with Tito. Watch</p> <p>3 how you question me. I'm listening.</p> <p><b>4 Q. But no one told you you're suspended?</b></p> <p>5 A. Yes. When I got on the app and it shows</p> <p>6 inactive, I have to call and find out.</p> <p><b>7 Q. And when you called, who did you talk to?</b></p> <p>8 A. Customer service.</p> <p><b>9 Q. And what did customer service say?</b></p> <p>10 A. That you was suspended for two weeks off the</p> <p>11 platform.</p> <p><b>12 Q. At any time after accepting a trip, did you</b></p> <p><b>13 then decline it?</b></p> <p>14 A. Any time I accepted a trip did I decline it?</p> <p><b>15 Q. Yeah. After accepting it, did you in the</b></p> <p><b>16 end decline it?</b></p> <p>17 A. Yeah, some of them I did for personal reasons.</p> <p>18 Because my kids has asthma and bronchitis. So my</p> <p>19 daughter bronchitis would flare up, or my son asthma</p> <p>20 would flare up at any point in time.</p> <p><b>21 Q. So those are some of the trips you couldn't --</b></p> <p><b>22 you had to decline after accepting?</b></p> <p>23 A. Yes, sir, because my kids are important to me.</p> <p><b>24 Q. And you believe your two-week suspension was in</b></p>
<p style="text-align: right;">Page 82</p> <p><b>1 trips you performed?</b></p> <p>2 A. This trip would be between me and Omar. So</p> <p>3 that means that the conversation would be between me and</p> <p>4 Omar. And I doubt he did it in a text because I don't</p> <p>5 see it, so that means that I must was talking to Omar.</p> <p>6 Tito is the only one that loved texting. He was like</p> <p>7 texting a little bit. Omar, he don't like texting that</p> <p>8 much. He normally call you and talk to you.</p> <p><b>9 Q. But do you have texts -- any texts with other</b></p> <p><b>10 drivers or chasers regarding performing trips between</b></p> <p><b>11 2019 and 2022?</b></p> <p>12 A. I said yes, sir.</p> <p><b>13 Q. Okay. Do you have any texts with anyone</b></p> <p><b>14 related to the -- what he said was a two-week suspension?</b></p> <p>15 A. Not that I know of. I know I talked to Marcus</p> <p>16 about it because he was mad about it. He was actually</p> <p>17 sitting in the car with me.</p> <p><b>18 Q. And the only way you were notif- -- apparently</b></p> <p><b>19 notified of the suspension was because your app wouldn't</b></p> <p><b>20 work?</b></p> <p>21 A. Yes, sir.</p> <p><b>22 Q. But that's the only reason you believe you were</b></p> <p><b>23 suspended, because your app wasn't working?</b></p> <p>24 A. Only reason I believe I was suspended is</p>	<p style="text-align: right;">Page 84</p> <p><b>1 2021 some time?</b></p> <p>2 A. I believe so, sir. I don't remember.</p> <p><b>3 Q. Do you remember exactly what it said in the app</b></p> <p><b>4 when you believe you were suspended?</b></p> <p>5 A. It was inactive. That's all I saw, was</p> <p>6 inactive. What I remember, should I say.</p> <p><b>7 Q. Is this the first lawsuit you've ever brought?</b></p> <p>8 A. Against DRAIVER, yes.</p> <p><b>9 Q. Against anyone. Have you ever brought a</b></p> <p><b>10 lawsuit against anybody before or currently?</b></p> <p>11 A. Not that I can think of. Have I participated</p> <p>12 in a lawsuit? Yes.</p> <p><b>13 Q. What lawsuit have you participated in?</b></p> <p>14 A. Because I drunk Red Bull, because I use</p> <p>15 Facebook.</p> <p><b>16 Q. The Facebook one was good. I think I got</b></p> <p><b>17 400 bucks, or something.</b></p> <p><b>18 So you've signed up to participate in class</b></p> <p><b>19 actions, is what you've done?</b></p> <p>20 A. Pretty much that's all it is.</p> <p><b>21 Q. But you've never been the named individual</b></p> <p><b>22 plaintiff in either lawsuits, right?</b></p> <p>23 A. Not to my recollection. Not to my knowledge,</p> <p>24 I've never been in no lawsuit. This is the first lawsuit</p>

<p style="text-align: right;">Page 85</p> <p>1 I've ever been in.</p> <p>2 <b>Q. Have you ever been convicted of any felonies</b></p> <p>3 <b>before?</b></p> <p>4 A. Convicted, no. Felonies, no.</p> <p>5 And if I'm not mistaken, don't DRIVER do a</p> <p>6 background check before they hire you?</p> <p>7 <b>Q. I'm not going to answer any questions.</b></p> <p>8 A. Okay.</p> <p>9 <b>Q. Did you sue Uber stating that you believe you</b></p> <p>10 <b>were an employee instead of an independent contractor?</b></p> <p>11 A. No.</p> <p>12 <b>Q. Why didn't you sue Uber?</b></p> <p>13 A. 'Cause Uber didn't treat me like DRIVER.</p> <p>14 <b>Q. What did you like about using the DRIVER app?</b></p> <p>15 A. Everything. Like I said, I had a passion for</p> <p>16 it. It was paying the bills, it was consistent. Some of</p> <p>17 the area managers was -- was acceptable. So I did -- I</p> <p>18 really did enjoy that job.</p> <p>19 <b>Q. Did you like the freedom that it provided you</b></p> <p>20 <b>to work when you wanted?</b></p> <p>21 A. That was okay. But I like the freedom of</p> <p>22 working, period. And they gave me consistency.</p> <p>23 <b>Q. Did the amount of money you made accepting</b></p> <p>24 <b>trips for DRIVER depend on the amount of trips you</b></p>	<p style="text-align: right;">Page 87</p> <p>1 THE WITNESS: It's disconnected.</p> <p>2 BY MR. BENSON:</p> <p>3 <b>Q. Mr. Wright, is there anything keeping you from</b></p> <p>4 <b>working today generally?</b></p> <p>5 THE VIDEOGRAPHER: I think he's -- I think he's --</p> <p>6 Oh, he's back again. One moment.</p> <p>7 THE WITNESS: There you go. It keep pausing. I</p> <p>8 don't understand.</p> <p>9 MR. BENSON: Let's give him a second. It says your</p> <p>10 bandwidth is low, but it'll probably get better in a</p> <p>11 second.</p> <p>12 THE WITNESS: Right. I'm sorry. That's better?</p> <p>13 MR. BENSON: Much better, yeah.</p> <p>14 THE WITNESS: Okay.</p> <p>15 BY MR. BENSON:</p> <p>16 <b>Q. Is there anything currently inhibiting you from</b></p> <p>17 <b>working generally?</b></p> <p>18 A. My vehicle. I don't have the funds to fix it.</p> <p>19 <b>Q. So it -- it -- generally for driving, you can't</b></p> <p>20 <b>drive on any ride --</b></p> <p>21 A. No, sir.</p> <p>22 <b>Q. So have you had no income for the last year and</b></p> <p>23 <b>two months?</b></p> <p>24 A. No, sir. Just my wife.</p>
<p style="text-align: right;">Page 86</p> <p>1 <b>accepted for DRIVER?</b></p> <p>2 A. No.</p> <p>3 <b>Q. If you accepted more trips for DRIVER, would</b></p> <p>4 <b>you usually make more money?</b></p> <p>5 A. Honestly, sir, it depends on the trip. It</p> <p>6 depends on the trip. And I can go a little further, it</p> <p>7 depends on the area manager, how much they want to put on</p> <p>8 there.</p> <p>9 <b>Q. What knowledge do you have that an area manager</b></p> <p>10 <b>has any input into how much a trip pays?</b></p> <p>11 A. Again, I been talk to Tito, Alex, and all of</p> <p>12 them countless of times. And then I'm talking to them,</p> <p>13 he done adjust my prices plenty of times. So that's how</p> <p>14 I know that they able to do it.</p> <p>15 <b>Q. So you know talking to the area managers, they</b></p> <p>16 <b>can adjust prices, and they did it?</b></p> <p>17 A. Yes, sir.</p> <p>18 <b>Q. Okay.</b></p> <p>19 <b>I'm almost done. I'm just going through my</b></p> <p>20 <b>notes here. I'm just making sure I have everything.</b></p> <p>21 THE VIDEOGRAPHER: Do you want to go off the video</p> <p>22 record because we lost --</p> <p>23 MR. BENSON: No, I can go.</p> <p>24 MR. QUALLS: There he is.</p>	<p style="text-align: right;">Page 88</p> <p>1 <b>Q. Just your wife's. Okay.</b></p> <p>2 A. Yes, sir. That's not enough to take care of my</p> <p>3 family.</p> <p>4 <b>Q. So is your job currently to take care of your</b></p> <p>5 <b>children?</b></p> <p>6 A. Yes, sir. Take care of my two little ones and</p> <p>7 three older ones. We have three teenagers.</p> <p>8 MR. BENSON: All right. I need five minutes off the</p> <p>9 record.</p> <p>10 Colby, I might be done, but I just need a</p> <p>11 couple minutes to determine if I am, okay?</p> <p>12 MR. QUALLS: All right.</p> <p>13 THE VIDEOGRAPHER: Okay. We're going to go off the</p> <p>14 video record. The time is 1:29 p.m. Central Time. Stand</p> <p>15 by.</p> <p>16 (A short break was had.)</p> <p>17 THE VIDEOGRAPHER: This is the start of Media Label</p> <p>18 No. 4. We're going back on the video record. The time</p> <p>19 is 1:38 Central Time.</p> <p>20 MR. BENSON: I have no further questions.</p> <p>21 MR. QUALLS: No questions for me.</p> <p>22 THE VIDEOGRAPHER: Okay. Does the court reporter</p> <p>23 need to get -- or have anything that you need to put on</p> <p>24 the -- on the record?</p>

<p style="text-align: right;">Page 89</p> <p>1 COURT REPORTER: Are we going to do signature on 2 this one, or -- 3 MR. BENSON: Did you say, Colby, you have no 4 questions? 5 COURT REPORTER: Yeah. He said no questions. 6 MR. BENSON: Okay. 7 COURT REPORTER: Is there signature on this one, or 8 no? I mean, I usually know that federal cases do not, 9 but I have attorneys that do request it. Do you want to 10 add it on the record if you want signature waived or 11 reserved on this? 12 MR. QUALLS: I would reserve. I'm not going to 13 request at this time. I will reserve the right to 14 request it. 15 COURT REPORTER: Mr. Benson, are you going to 16 order -- 17 MR. BENSON: I'll order it. Slow delivery. Nothing 18 expedited or anything. 19 COURT REPORTER: And then the exhibits, are you 20 going to send them to me? 21 MR. BENSON: Yeah. Once we get off the record. I 22 don't know if we're off the record, but can we talk about 23 the exhibits. 24 COURT REPORTER: Yeah.</p>	<p style="text-align: right;">Page 91</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 NORTHERN DISTRICT OF ILLINOIS 3 EASTERN DIVISION 4 ISSAC WRIGHT, Individually and on ) 5 Behalf of All Others Similarly ) 6 situated, ) 7 ) 8 Plaintiff, ) 9 ) 10 vs. ) No. 1:22-cv-4553 11 ) 12 DRIVERDO, LLC, ) 13 ) 14 Defendant. ) 15 ) 16 ) 17 ) 18 ) 19 ) 20 I, ISAAC WRIGHT, state that I have read the 21 foregoing transcript of the testimony given by me at my 22 videoconferenced deposition on the 27th day of April, 23 A.D., 2023, and that said transcript constitutes a true 24 and correct record of the testimony given by me at the 25 said deposition except as I have so indicated on the 26 errata sheets provided herein. 27 ) 28 ) 29 ) 30 ) 31 ) 32 ) 33 ) 34 ) 35 ) 36 ) 37 ) 38 ) 39 ) 40 ) 41 ) 42 ) 43 ) 44 ) 45 ) 46 ) 47 ) 48 ) 49 ) 50 ) 51 ) 52 ) 53 ) 54 ) 55 ) 56 ) 57 ) 58 ) 59 ) 60 ) 61 ) 62 ) 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8                   ROCIO ARIAS, CSR  
9                   180 North LaSalle Street  
10                  Suite 2800  
11                  Chicago, Illinois 60601  
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